

*For EPA personnel and partners who wish to implement collaborative problem solving projects effectively.*

## Western Regional Air Partnership

*Partnership of Governors, Tribes, and Federal Agencies form "WRAP" to develop innovative measures to improve air quality in the West*

### Background

Haze, often generated from hundreds of miles away, regularly invades western parks and wilderness areas, obstructing the spectacular vistas visitors come to enjoy. Recognizing both the aesthetic and economic value of unimpaired views, western governors embarked on an ambitious program to address the problem in 1997.

The governors first took up the issue of regional haze through their participation in the Grand Canyon Visibility Transport Commission. The Commission developed a comprehensive set of recommendations for addressing regional haze in parks and wilderness areas on the Colorado Plateau. To advance the implementation of these recommendations, the governors joined with tribes and federal agencies to form the Western Regional Air Partnership (WRAP).

The WRAP, like its Commission predecessor, is committed to building political consensus for its actions. To this end, the partnership has established a series of committees and forums with stakeholder membership to address technical issues and develop approaches for improving air quality in the West.

One of the most important tasks of the WRAP is to provide a framework for addressing regional haze throughout the West. In April 1999, EPA promulgated a national rule for addressing

visibility in parks and wilderness areas, on which the Western Governors' Association submitted extensive comments. WGA's comments were instrumental in developing rule provisions both to implement the recommendations of the Commission and to protect and enhance visibility in more than 100 national parks and wilderness areas in the West.

### Why the WRAP Worked

The WRAP is largely a coordinating organization, carrying no legal authority unless the states or EPA adopts its recommendations. Nonetheless, given the consensus nature of its recommendations, its decisions are usually adopted by the states without the need for intervention by the federal government.

The WRAP's committees and forums seek consensus among the governmental partners and stakeholders, including large and small businesses, academia, environmental groups and other public interest representatives. Scientific findings and policy options are presented to policy makers and the public for appropriate discussion and response. Typically, the findings and options go before the WRAP Board, which consists of state, tribal and

federal representatives. As a coordinating organization, the WRAP is committed to bringing together all those who may contribute to or be affected by poor air quality.

The Western Governors Association in Denver and the National Tribal Environmental Council in Albuquerque receive funding from the U.S. EPA to administer and support the WRAP. The majority of the work is done by individuals serving on the WRAP committees and forums, with assistance from WGA and NTEC staff as well as outside contractors. The WRAP policy and technical forums prepare annual work plans under the direction of a planning committee, focusing on the work products to meet the strategic goals of the regional haze program. The WRAP depends on the great contribution from organizations and individuals who give their often non-reimbursable time and effort to committee and forum work.



The WRAP has demonstrated there is tremendous value in states and tribes working together as environmental stewards. We have a better grasp of the problem, and we've reached consensus on innovative regional strategies to improve air quality.

- Patrick Cummins, Co-Director of the WRAP

## What Made the WRAP Unique

The WRAP is a collaborative effort of 13 tribal governments, 13 state governments and several federal agencies. The WRAP represents an unprecedented, consensus-based approach to regional air quality planning, with the goal of protecting visibility in some of our most cherished national parks in the western U.S. This investment in regional planning has resulted in improved scientific understanding, regional emissions inventories, regional modeling, regional policy development, regional technical tools, and invaluable experience in inter-state communication and coordination. The WRAP has an exemplary record of state and tribal coordination, which has resulted in the first-ever emission inventories for 30 tribes. Due to the WRAP's success as an organization, EPA established four other Regional Planning Organizations in other parts of the country.

## Lessons Learned

The efforts and products from the WRAP have shown that there is an innovative, alternative way of doing the important business of environmental protection. Rather than following the old paradigm of prescriptive federal laws and regulations, which, traditionally, are followed by state action, often contentious federal review, and all too often by third party litigation, the participants in the Commission's process focused jointly on innovative approaches to problems and solutions. Regional planning is critical to making progress on air quality issues that will only get more complicated, and are typically less suited to traditional regulatory approaches and controls.

## Results

Visibility in the West has improved

because of the pioneering work of the Grand Canyon Visibility Transport Commission, and Western Regional Air Partnership. These collaborations have changed the way the West solves its environmental problems, providing a model for environmental progress that federal regulators have adopted.

In 1999, the first major issue before the WRAP was developing a regional sulfur dioxide trading market for stationary sources in lieu of Best Available Retrofit Technology (BART). On Sept. 25, 2000, the WRAP approved a set of recommendations for reducing sulfur dioxide emissions from large industrial sources, including a backstop "cap-and-trade" program. Under this program, a stationary source of emissions receives a certain number of "allowances," and a source that exceeds its allowances can purchase allowances from another source that is under its limit. A diverse group of stakeholders, including representatives from government, industry, environmental and nonprofit organizations and academia, developed the adopted recommendations that were developed over three years. EPA approved the WRAP's recommendations on sulfur dioxide emissions in April 2002 as an annex to the 1996 report of the Grand Canyon Visibility Transport Commission.

Mike Leavitt, former Governor of Utah and co-chair of the WRAP, expressed that *"reaching a consensus on this difficult issue took an extraordinary amount of commitment and hard work by stakeholders and governmental representatives. This type of collaborative process focuses on voluntary, market-based and results-oriented approaches to environmental and natural resource management using what we call the Enlibra principles. This successful agreement will serve as an*

*example for future efforts within the WRAP and for other environmental and natural resource problem-solving."*

## Keys to Collaboration Exemplified

The Western Regional Air Partnership demonstrates six keys for collaborative problem solving.

The haze that regularly invades western parks and wilderness areas was a **shared problem** for western governors. Many were concerned that obstructing the spectacular vistas enjoyed by visitors would lead to shortfalls in tourism revenue.

The Grand Canyon Visibility Transport Commission was the **convener of stature**, and it provided western governors with a means to initially address the issue of regional haze. The governors in western states were the **committed leaders**, for an ambitious program, that set out to implement the Commission's recommendations.

The **representatives of substance** for the WRAP included western governors, tribes, as well as federal agencies, and providing a framework for addressing regional haze throughout the West was the **clearly-defined purpose**.

The **formal charter** for the WRAP establishes a commitment to the use of stakeholder processes to build political consensus for its actions. The charter also sets up a series of committees and forums with stakeholder membership.

## For more information

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