

February 26, 1999

State and Local Air Quality Agencies  
c/o STAPPA/ALAPCO

The expansion of the IMPROVE Class I visibility monitoring network is finally underway. In this letter I will:

- describe the status of the process so far;
- lay-out how IMPROVE intends to insure that state and local agencies are involved and have buy-in as siting decisions occur during the next year;
- ask for your help in designating a state or local agency contact if you are in one of the states that will be getting a new monitor; and
- refer you to the attachment for more detail.

The most important information in this letter is that new IMPROVE sites are being installed in 20 states during 1999<sup>1</sup>. In order to ensure a smooth installation I am asking that a local contact in your agency be identified that I can forward to IMPROVE's contractor. Please call or email me with this information at your earliest convenience. I encourage each agency to begin work now to partner with local federal land managers and begin the process of site evaluation. If state/local agencies do not wish to participate, IMPROVE's contractor and local federal land managers will proceed with site installation consistent with the procedures detailed in the attachment to this letter. There is more detail about these important subjects below.

#### Expansion Status

In December 1998, the IMPROVE steering committee met over several days in Portland, OR. Several significant decisions were made including the steering committee's unanimous blessing of a regional haze monitoring network. The IMPROVE Clusters are included as Appendix 1 in the attachment to this letter and show how the 108 monitoring locations will be used to represent regional haze in all 156 Class I areas. All state and local agency comments on the draft expansion information sent to you previously were accommodated in full. Another important decision was to add MARAMA to the steering committee, providing state/local air quality organizations with as many seats at the table as held by federal land managers.

The expansion has been slow in getting underway due to contracting challenges. IMPROVE's contract with the University of California at Davis expired at the end of 1998. A competitive bid process was initiated during 1998 and UC Davis has been chosen to continue as IMPROVE's aerosol contractor. Additional responsibilities include expanding the aerosol network and working with state and local air quality agencies (as well as local federal land managers) to select and install the monitoring sites. The new contract is now in place and UC Davis has begun work purchasing new equipment and making plans to get into the field. By the end of 1999, the

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<sup>1</sup>States receiving at least one new monitoring site are: Georgia, North Carolina, Florida, Louisiana, Missouri, Michigan, Arkansas, Oklahoma, California, Idaho, New Mexico, Arizona, Utah, South Dakota, Alaska, Washington, North Dakota, Montana, Wyoming, Oregon.

expansion is to be complete: IMPROVE will expand from 30 sites to 108 sites, existing samplers will be retrofitted with a new control system, and samplers will be switched to a 1-in-3 day schedule.

### Site Selection Process

In previous correspondence, IMPROVE committed to providing opportunities for state and local agencies to be involved with, buy-into, and participate in the selection of new sites and installation of the monitoring equipment. It is up to the state or local agency to determine how involved it wishes to be. Any level of involvement in the process can be accommodated.

Ideally, IMPROVE's contractor, the local federal land manager, and the state and/or local air quality agency will work together to select a site. We suggest that local federal land managers and the state and/or local air quality agency visit potential sites, take pictures of potential sites, fill-out site evaluation forms, and communicate with UC Davis. Site selection may occur quite easily in this manner. While the site selection criteria and guidelines attached to this letter are important, they are not absolutes. Whether or not the criteria are stretched, it will be important to build a record as to why a particular site was chosen and for the state/local regulatory agency to indicate they believe it will represent regional haze. Please contact me if it appears that any of the criteria will need to be significantly stretched to accommodate the consensus choice.

More challenging locations may involve developing additional candidate sites and UC Davis may want to schedule a site evaluation visit to meet with local agencies. If there are significant disagreements regarding site location, the IMPROVE steering committee has pledged its assistance to any situation where agreement has not been reached on a site. It will be critical to document the trade-offs between different sites as a basis for making a decision. Please contact me if it appears necessary for the steering committee to be involved in resolving a site selection issue. While everyone's voice will be important in reaching agreements on site locations, in the case of disagreements I will be inclined to recommend to the steering committee that deference be given to states. In these situations, I anticipate a focus on the siting alternatives that a state believes will be representative of regional haze. If states cannot or will not sign-off on a site, the steering committee will make the best choice among the available options.

If state or local agencies do not wish to participate in site selection, IMPROVE's contractor is instructed to proceed in collaboration with the local federal land manager. In any event, site selection should be documented and should be consistent, as much as practical, with procedures developed by UC Davis. These procedures are included in the attachment to this letter.

From a regulatory standpoint, states will be able to indicate in their regional haze SIPs their acceptance or not of monitoring sites for the purpose of the regional haze program. However, the SIP process will not occur for several years and the expansion of IMPROVE is occurring during the next 10-11 months. The best way to ensure your needs are met is through working collaboratively with IMPROVE and local federal land managers. I am available to work through issues and others on the steering committee have also indicated their willingness to help.

### Who Should Be the Designated Contact for Your Agency?

If a state or local agency wants to be involved in the site selection process, it is very important that agencies provide to me the name(s) of individuals in the agency(s) that will actually be involved in site selection. This letter is being sent to the directors of air agencies, national and regional state air quality organizations, IMPROVE steering committee members, and to members of STAPPA/ALAPCO's monitoring committee. I have asked federal land managers to also provide me with a list of local contacts in the National Park Service, U.S. Forest Service, and U.S. Fish and Wildlife Service. I will combine the lists of federal land managers and state/local contacts and forward them to UC Davis. If I do not hear from you, I will ask UC Davis to contact the director of your agency when it is time for the contractor to install the site.

The Attachment

The attachment contains the *IMPROVE Particulate Monitoring Network Procedures for Site Selection, Appendix 1 IMPROVE Clusters, Appendix 2 Photo Log, Appendix 3 Site Evaluation Form, and Appendix 4 Site Information Form*. These materials are designed to provide both a blueprint and tools to assist UC Davis, local federal land managers, and state/local agencies during the site selection process. If you have any comments or suggested changes to the procedures or appendices, do not hesitate to contact me.

Thank you very much for your attention to this expansion of the IMPROVE network. Please contact me if I can be of assistance to you in any way during the expansion.

Sincerely,

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