

## Appendix 2

### SIP Development Plans

**Purpose:**

The purpose of the SIP development plan is to document expectations among various agencies that will be responsible for SIP revision development and final SIP approval. These agencies may include, among others, the local air pollution control agency, state control agency, local (metropolitan) planning organizations, cities, counties, fire districts, Tribes, and EPA Region 10. The SIP Development Plan could include other “pre-SIP” development documents such as the Technical Analysis Protocol (TAP), Inventory Preparation Plan (IPP), Modeling Protocol, etc. It should include discussion and agreement on all potential technical and policy/legal issues before SIP work is initiated. The SIP Development Plan should be a living document to which sections are added as they are developed.

**Contents:** The SIP Development Plan should include the following. Please contact EPA Region 10 for sample SIP Development Plans

- 1) Purpose and objectives of the SIP revision. This section should also include a discussion of this SIP revision in relation to the Annual SIP Priorities Document and the priority relative to other SIP revisions proposed in the year.
- 2) Who will be involved in the development, approval and implementation of the revision? What is their role at each step of the SIP development?
- 3) Schedule of milestones and due dates from initial development of the SIP Development Plan to final approval by EPA.
- 4) Potential technical and legal/policy issues and their agreed upon resolution
- 5) Appendices: (as appropriate)
  - TAP
  - IPP
  - Modeling protocol
  - Rule revision analysis

**Process:** The process for preparing the SIP development plan should follow these steps:

- The State should notify EPA and other appropriate agencies that they propose a SIP revision. The State should then develop a draft SIP Development Plan that includes items 1, 2, 3, and 4 above.
- The State should provide the draft Development Plan to EPA and other appropriate agencies for review and comment.
- EPA and State reach agreement and jointly sign the plan.
- The State should add additional documentation (TAP, IPP etc) as they are developed and signed.

#### Q&A for SIP Development Plan Clarification

*What is a SIP Development Plan?*

The SIP Development Plan is a document that details the purpose of the SIP revision or plan, a schedule of major milestones, the roles of each contact and agency in the process, and identification of potential technical, legal and policy issues. Major milestones include draft deadlines, EPA review dates (prior to public hearing), agency adoption dates, etc.

***How is the SIP Development Plan useful to EPA, State and local agencies?***

The SIP Development Plan helps States, locals and EPA schedule work more effectively because commitments to due dates are negotiated and agreed upon by all parties. Issues are identified and resolved in a timely manner. The SIP Development Plan allows all parties to add value to the project and give their perspective from the beginning of the process.

***For what types of revisions should a SIP Development Plan be prepared?***

SIP Development Plans should be used for complex and moderate SIP revisions. Minor SIP revisions may not require a SIP Development Plan. This would be agreed to on a case by case basis.

***When should the SIP Development Plan be prepared?***

The SIP Development Plan should be prepared after the State/local agency has defined the project's scope but before the State/local initiates work on a SIP revision. Particularly for rule revisions, we encourage SIP Development Plans (at the minimum a timeline) be drafted at least six (6) months prior to expected EPA review.

***How is the SIP Development Plan negotiated?***

The State/local project lead and EPA project lead negotiate issues, deliverables, and timelines that can be met given everyone's workload.

***What format should be used for a SIP Development Plan?***

The format could be structured in many different ways. The following is a basic outline:

- I. Background
- II. Purpose and Objectives
- III. Priority
- IV. Who is Involved
- V. Schedule of Milestones and Projected Due Dates
- VI. Potential Technical, Legal, and Policy Issues

***How many pages should the SIP Development Plan be?***

The SIP Development Plan is usually from 1 to 3 pages.

***Has the concept of a SIP Development Plan changed since the original SIP PIP Report?***

The concept has changed based on our experience. Originally the SIP PIP Report envisioned a preliminary SIP Development Plan that included role clarification, timeline, and resources, followed by a final SIP Development Plan that incorporated decisions on policy and legal issues and elements such as the TAP, IPP, modeling protocol, and rule revision analysis. Now we simply use one dynamic plan rather than making a distinction between a preliminary and final plan. The SIP Development Plan guides and documents the development process and may evolve as the project changes over time.

***How is the SIP Development Plan revised as elements change?***

The SIP Development Plan should be revised when changes in roles and deadlines are made and agreed upon. This could be as simple as a phone call with a follow-up email. Agreement and resolution of all technical, legal and policy issues should be documented in some way, and could be but do not have to be included/attached to the SIP Development Plan.