III.K.13.A PURPOSE AND SCOPE OF THE ALASKA REGIONAL HAZE STATE IMPLEMENTATION PLAN

1. OVERVIEW

A State Implementation Plan (SIP) is developed and implemented by states as required by the federal Clean Air Act (CAA), with formal approval and administration by the U.S. Environmental Protection Agency (EPA). A SIP consists of narrative overviews, background information, strategy plans, technical data, data analyses, and implementation plans for complying with CAA requirements. In Alaska, the Air Quality Control Plan (AK SIP), which contains the required SIPs for Alaska, is incorporated by reference into state regulations at 18 AAC 50.030.

This chapter of the AK SIP addresses the federal rules for protection of visibility specifically related to regional haze. These federal rules were adopted to fulfill requirements of Sections 169A and B of the CAA, which have their purpose to protect and improve visibility at specified federal land units identified as Class I areas.

Despite Alaska's many national parks, forests, wildlife refuges, and wilderness areas, Alaska has only four such mandatory areas because most of these areas were set aside after the inclusion of the Class I areas in the 1977 CAA. Table III.K.13.A-1 lists the four federal Class I areas located within the state: Denali National Park (Denali NP), Tuxedni National Wildlife Refuge/National Wilderness Area (Tuxedni), Simeonof National Wildlife Refuge/National Wilderness Area (Simeonof), and the Bering Sea National Wildlife Refuge/National Wildlif

Table III.K.13.A-1 Class I Federal Areas Located Inside and Outside of Alaska Impacted by Emissions Produced Within Alaska		
Class I Federal Area	Located in Alaska	Located Outside of Alaska
Denali National Park	Yes	-
Tuxedni National Wildlife Refuge/National Wilderness Area	Yes	-
Simeonof National Wildlife Refuge/National Wilderness Area	Yes	-
Bering Sea National Wildlife Refuge/National Wilderness Area	Yes	-
None	-	Yes

¹ By distance, the Class I Areas nearest to Alaska would be either the Olympic National Park (1,426 miles) or the North Cascades National Park (1,462.06 miles) in the state of Washington. This is measured using Chisik Island (Tuxedni National Wildlife Refuge) as the AK point of reference.

Figure III.K.13.A-1 Alaska Class I Areas



This Regional Haze Plan² (RH SIP or RH Plan) describes how the State of Alaska will meet federal requirements to measure and monitor visibility, aerosols, and air pollution at Alaska's four Class I areas, how Alaska will evaluate the factors reducing visibility at each site, and how Alaska plans to identify and implement air pollution control measures to reach natural visibility conditions by 2064, the date identified in the 1999 RH Rule for achieving natural visibility conditions. This plan includes both the characterizations of the baseline air quality at each of Alaska's Class I areas and Alaska's strategy toward meeting the interim goals to be attained by 2028. All pollutants and aerosols affecting visibility are considered by this plan, including those entering Alaska at its borders. Air pollution sources, transport, and atmospheric precursors of aerosols originating within Alaska and entering Alaska from Asia, Europe, and Canada are considered in the SIP.

Each of the 50 states is required to address the Regional Haze Rule (RH Rule) alongside other statutory obligations under the 1971 Clean Air Act (CAA) and its subsequent amendments. But, haze is inherently a regional, and frequently even international, phenomenon. Coordinated technical services, modeling, data management, and consulting have been provided by regional planning organizations. For Alaska, the Western Regional Air Partnership (WRAP) has served this function. Technical tool development, emission inventories, and air quality modeling have been conducted on a regional basis by the WRAP to support the efforts of all of the western states. Alaska has participated actively in WRAP projects and uses WRAP technical products applicable to Alaska in this plan.

The RH Rule, promulgated pursuant to the CAA and its amendments, specifically regulates visibility. The aerosols and pollutants that reduce visibility also impact human health and ecosystems in Alaska. Consequently, the implementation of this RH Plan will impact Alaska's people and ecosystems in a broader manner. Alaska receives air pollutants across all its boundaries, from many international sources. Many of these sources are subject to their own nations' environmental regulations which differ from those of the United States and the State of Alaska. In addition, natural sources contribute to visibility impairment, but natural emissions cannot be realistically controlled or prevented by the states. The analysis of Alaska's air for the development of this plan gives us greater understanding of how our air quality is affected by international sources as well as natural sources.

² The term "Regional Haze Plan" is used to refer specifically to this plan to address the requirements of the Regional Haze Rule; however, the term "RH Plan" and "RH SIP" may be used interchangeably.

2. WHY VISIBILITY?

Visibility is reduced, or impaired, when particles and gases in the atmosphere reflect, scatter, or absorb light. The visual range, or distance that we can see, is limited by very small particles in the air. The particles absorb and scatter sunlight, creating haze. Haze affects the color, contrast, and clarity of the vistas, wildlife, forests, seascapes, and ecosystems we can see. Good visibility is important to the enjoyment of national parks and scenic areas.

Many different types of particles and gases are released into the atmosphere through human activities. Not only do the pollutants released directly reduce visibility, but also the pollutants can react chemically with each other to create new types of pollutants which also affect visibility. The individual pollutants that create haze are measurable, for instance as sulfates, nitrates, organic carbon, elemental carbon, soil dust, or sea salt. But while many different types of pollutants contribute to impaired visibility, visibility is a single measure that includes the effects of many pollutants.

3. EPA'S VISIBILITY REGULATIONS AND THE REGIONAL HAZE RULE

A. History of the Regional Haze Rule

In 1977, Congress amended the CAA to include provisions to protect the scenic vistas of the nation's national parks and wilderness areas. In these amendments, Congress declared as a national visibility goal:

The prevention of any future, and the remedying of any existing, impairment of visibility in mandatory Class I Federal areas which impairment results from manmade air pollution. (Section 169A)

At that time, Congress designated all wilderness areas over 5,000 acres and all national parks over 6,000 acres as "mandatory federal Class I areas". These Class I areas receive special visibility protection under the CAA. Figure III.K.13.A-2 shows the 156 national parks and wilderness areas designated as Class I areas.

The 1977 CAA amendments charged Federal Land Managers (FLMs) with an advisory and consultation role to protect the air quality and related values (including visibility) in areas of great scenic importance (that is, Class I areas) and to consider, in consultation with the EPA, whether proposed industrial facilities will have an adverse impact on these values. States were required to determine whether existing industrial sources of air pollution must be retrofitted to reduce impacts on Class I areas to acceptable levels. The EPA was tasked to report to Congress regarding methods for achieving greater visibility and to issue regulations towards that objective.



Figure III.K.13.A-2: Mandatory Class I Areas Map in the United States.

Part C of the 1977 CAA amendments stipulated requirements to prevent significant deterioration of air quality and, in particular, to preserve air quality in national parks, national wilderness areas, national monuments, and national seashores. The Prevention of Significant Deterioration (PSD) program includes area-specific (Class I, II, and III) increments or limits on the maximum allowable increase in air pollutants (particulate matter or sulfur dioxide) and a preconstruction permit review process for new or modifying major sources that allows for careful consideration of control technology, consultation with FLMs on visibility impacts, and public participation in permitting decisions.

Under CAA Section 169A(b), Congress established new requirements on major stationary sources in operation within a 15-year period prior to enactment of the 1977 amendments. Such sources to which visibility impairment can be reasonably attributed must install best available retrofit technology (BART) as determined by the State. In determining BART, the State must take into consideration the costs of compliance, the energy and non-air quality environmental impacts of compliance, any existing pollution control technology in use at the source, the remaining useful life of the source, and the degree of improvement in visibility which may reasonably be anticipated to result from the use of such technology.

On December 2, 1980, the EPA outlined a phased visibility program to ensure progress in achieving the national goal set forth by Congress. Regulations promulgated for Phase I of the program (under 40 CFR §51.300 through 307) required Alaska, 34 other states, and 1 territory with mandatory Class I areas to revise their SIPs to include visibility protection.

Phase I of the visibility regulations focused on "reasonably attributable visibility impairment" (RAVI) and required states to:

- Coordinate SIP development with the appropriate FLMs.
- Develop programs to assess and remedy Phase I visibility impairment from existing major sources and to prevent visibility impairment from new sources.
- Develop a long-term strategy to address reasonable progress toward the national visibility goal.

- Develop a visibility monitoring strategy to collect information on visibility conditions.
- Consider in all aspects of visibility protection any "integral vistas" (important views of landmarks or panoramas that extend outside of the boundaries of the Class I area) identified by the FLMs or states as critical to the visitors' enjoyment of the Class I areas. (An integral vista that is adopted into regulation can be afforded the same level of protection from visibility impairment as the Class I area itself or any lesser level of protection, as determined by a state on a case-by-case basis.)

In response to EPA's Phase I visibility rules, the Alaska Department of Environmental Conservation (DEC) adopted regulations and SIP revisions in 1982 that identified visibility special protection areas including the mandatory Class I areas, two integral vistas within Denali NP, and a visibility protection program for mandatory Class I areas through DEC's PSD permitting program. This SIP was approved by EPA in the Federal Register on July 5, 1983.

B. Summary of the 1999 Federal Regional Haze Rule

The 1990 amendments to the CAA established a new Section 169(B) to address regional haze. Since regional haze and visibility problems do not respect state and tribal boundaries, the amendments also authorized EPA to establish visibility transport regions as a way to combat regional haze. The 1990 amendments also established a visibility transport commission to investigate and report on regional haze visibility impairment in the Grand Canyon National Park and nearby Class I areas. EPA adopted "Phase II" visibility rules in 1999, the RH Rule.

The RH Rule requires states to adopt regional haze SIPs that focus on improving the most impaired days (the worst 20%) and protecting the clearest days (the best 20%). The RH Rule lays out the mechanisms by which states define long-term paths to improve visibility, with the goal of achieving visibility that reflects natural conditions by 2064. Unlike criteria pollutant SIPs, which require specific targets and attainment dates, the RH Rule requires states to establish a series of interim goals to ensure continued progress. The first planning period set reasonable progress goals (RPGs) for improving visibility in Class I areas by 2018 and the second planning period sets RPGs to be achieved through the year 2028.

C. Summary of the 2017 Regional Haze Rule Update

In January 2017, the EPA released an update to the 1999 RH Rule in preparation for the submission of SIPs for the second implementation period and following progress report. Additionally, EPA has released several pieces of technical guidance to assist states in their regional haze planning for this implementation period.

One of the notable stipulations of the January 2017 RH Rule was the extension of state submission deadlines from 2018 to July 2021, allowing an additional three years for states to respond to new measurement protocols for visibility impairment calculations. These new protocols include a recalculation of visibility conditions on days with low visibility impairment (clearest days) and high visibility impairment (most impaired days/MID). As a result of this extended deadline for SIP submission, the progress report to EPA was moved to January 31, 2025.

In addition, the 2017 RH Rule extended the window for FLMs to review a state's draft SIP to 120 days, or four months. This provides FLMs with the opportunity to provide detailed feedback on proposed visibility approaches prior to the draft SIP being released for public review and comments.

The 2017 RH Rule includes a provision that allows states to propose an adjustment to the glidepath to account for impacts from anthropogenic sources outside the United States, if the adjustment has been developed through scientifically valid data and methods. The EPA's visibility guidance³ states "to calculate the proposed adjustment(s), the State must add the estimated impact(s) to the natural visibility condition and compare the baseline visibility condition for the most impaired days to the resulting sum." Alaska challenged these stipulations in federal district court, arguing that it was the responsibility of EPA to provide the methodology by

³ EPA, 2018. Technical Guidance on Tracking Visibility Progress for the Second Implementation Period of the Regional Haze Program, EPA-454/R-18-010, https://www.epa.gov/sites/production/files/2018- 12/documents/technical_guidance_tracking_visibility_progress.pdf, December 2020.

which DEC could estimate the contribution of international sources at Class I areas. The issue of international contribution will be discussed elsewhere in this plan.

D. Specification Under the Second Implementation Period

The 2017 RH Rule lays out specific requirements to ensure improvements in the anthropogenic components of visibility. Some of these requirements carry over into the second implementation period without application to additional Class I areas or stationary facilities:

- One of the core requirements of the first RH Plan was the implementation of the BART requirements, which addressed larger industrial sources identified to have begun operations before the 1977 PSD Rules. Under the 2017 RH Rule, BART stipulations remain in place for those facilities where it was applied in the first round of planning, but they are not applied to new facilities.
- The reasonable progress demonstration requires setting goals for the 20% clearest and most impaired days in each Class I area, based
 on an evaluation of how emissions reduction strategies including best practices and control technologies along with future modeling
 of individual and source sectors will improve or protect visibility conditions.
- States are required to conduct four-factor analyses on sources and groups of sources which could reasonably be identified as influencing Class I areas on their most impaired days. Conducting a four-factor analysis does not imply the application of emissions reduction techniques on stationary sources or source categories. These reviews can be a full review, meaning that state air agencies coordinate with stationary source owners to discuss control options. Alternatively, DEC's interpretation of the EPA rules and guidance is that these analyses can be a limited review, which can be an in-house review of source emissions and control options using available data submitted for permitting and yearly compliance.

4. CLASS I AREAS IN ALASKA

Figure III.K.13.A-1 shows the locations of Alaska Class I areas, with Denali National Park in the Interior, Tuxedni and Simeonof Wilderness Areas as coastal, and the Bering Sea Wilderness Area far offshore. Due to Alaska's status as a non-contiguous state, together with its physical distance from the continental United States and its small population and industrial base, DEC has determined that there are no Class I areas in other states affected by its emissions. The state is heavily impacted by international emissions generated in the Russian Far East and Siberia, East Asia, Canada, and Europe, along with international marine traffic conducting trade between North America and Asia.

A. Denali National Park and Preserve

Denali National Park and Preserve (Denali NP) is a large park in the interior of Alaska. It has kept its integrity as an ecosystem because it was set aside for protection fairly early in Alaska's history. Denali NP headquarters lies 240 miles north of Anchorage and 125 miles southwest of Fairbanks, in the center of the Alaska Range. The park area totals more than 6 million acres. Denali, at elevation 20,320 feet, is the highest mountain in North America and is a prominent feature in the park and throughout Alaska. Denali NP accommodates a wide variety of visitor uses. The Alaska Range divides the park into two geographic zones by blocking warm moist air from the Gulf of Alaska from getting to the interior inland side of the park. The park has many vegetation types associated with the variety of aspects and elevations within the park; elevations range from 2000 feet to over 20,000 feet above sea level. The park contains numerous glaciers, permafrost and high mountains. The tree-line in Denali NP is typically around 3,000 feet above sea level. Denali NP is the only Class I area in Alaska that is easily accessible and connected to the road system. Denali NP has the most extensive air monitoring of Alaska's Class I areas, so more detailed examinations of long-term and seasonal air quality trends are possible for this site.

B. Simeonof National Wildlife Refuge/National Wilderness Area

Simeonof National Wildlife Refuge/National Wilderness Area (Simeonof) consists of 25,141 acres located in the Aleutian Chain, 58 miles from the mainland. It is one of 30 islands that make up the Shumagin Group on the western edge of the Gulf of Alaska. Access to Simeonof is difficult due to its remoteness and the unpredictable weather. It is home to greater than 55 species of birds as well as sea otters, hair seals, walruses, Arctic foxes, ground squirrels, and at least 17 species of whales. The vegetation is naturally treeless with wetlands mixed in with coastal cliff, meadow, and dune environments. There are 188 taxa of lichens in the park. Winds are mostly from the north and northwest as part of the midlatitude westerlies. Occasionally winds from Asia blow in from the west.

The island is isolated and the closest air pollution sources are marine traffic in the Gulf of Alaska, the North Pacific Ocean, and the community of Sand Point.

C. Tuxedni National Wildlife Refuge/National Wilderness Area

Tuxedni National Wildlife Refuge/National Wilderness Area (Tuxedni) is located on a fairly isolated pair of islands in Tuxedni Bay off of Cook Inlet in Southcentral Alaska. There is little human use of Tuxedni except for a few kayakers and some backpackers. There is an old cannery built near Snug Harbor on Chisik Island which is not part of the wilderness area; however it is a jumping off point for ecotourists staying at Snug Harbor arriving by boat or plane. Set nets are installed around the perimeter of the island and in Tuxedni Bay during fishing season.

Along with commercial fishing, Cook Inlet has reserves of gas and oil that are currently under development. Gas fields are located at the Kenai area and farther north. The inlet produces 30,000 barrels of oil a day and 485 million cubic feet of gas per day. Pipelines run from Kenai to the northeast and northeast along the western shore of Cook Inlet starting in Redoubt Bay. The offshore drilling is located north of Nikiski and the West McArthur River. All of the oil is refined at a refinery in Nikiski for use in Alaska and overseas.

D. Bering Sea National Wildlife Refuge/National Wilderness Area

The Bering Sea National Wildlife Refuge/National Wilderness Area (Bering Sea) is located off the coast of Alaska about 350 miles southwest of Nome. Hall Island is at the northern tip of the larger St Matthew Island. St Matthew Island is remote with arctic foxes and insular voles joined by the occasional polar bear that comes in off the pack ice. Ringed seals and Steller sea lions haul themselves up on the shore. 125 species of birds are present on the tundra and rock covered island. There is trawling for king crab offshore. Lichen species were heavily overgrazed when the Coast Guard introduced reindeer to the island in 1944; mosses, forbs, and shrubs took over leaving about 10% of the lichen cover. The reindeer are gone, but 22 years later the lichens are only very slowly growing back.

5. ELEMENTS OF THE REGIONAL HAZE PLAN

Each RH SIP must provide a comprehensive analysis of natural and human-caused sources of haze for each Class I area. It must also contain strategies to control the sources and reduce the emissions that contribute to haze. The intent is to focus on reducing anthropogenic emissions, while achieving a better understanding and quantification of the natural causes of haze.

RH SIPs must contain many technical elements and analyses, as well as background information. The required elements of the plan are explained briefly in this section, and then detailed in the sections outlined below.

- Monitoring Strategy (Section III.K.13.C)
- Determination of baseline, current and natural visibility conditions (Section III.K.13.D)
- Base year and future year emission inventories Section III.K.13.E
- Long-term strategy for regional haze (Section III.K.13.H)
- Progress-to-date and the uniform rate of progress (Section III.K.13.I)

- Reasonable progress goals (Section III.K.13.I)
- Consultation with states, tribes, and federal land managers (Section III.K.13.K)

In addition to the required elements, this RH SIP includes analysis of controllable sources within Alaska (Section III.K.13.F) and modeling analyses to support selection of controllable sources and development of RPGs (Section III.K.13.G).

A. Monitoring Strategy

The RH SIP includes a monitoring plan for measuring, estimating, and characterizing air quality and visibility impairment at Alaska's four Class I Areas. The haze species concentrations are measured as part of the Interagency Monitoring of Protected Visual Environments (IMPROVE) monitoring network deployed throughout the United States. Alaska uses four IMPROVE monitoring stations representing three of the four Class I areas. There is no air monitoring being conducted for the Bering Sea Class I area due to its remote location. Monitoring and additional research addressing transboundary sources of pollution in Denali NP are described in Section III.K.13.C.

B. Determination of Baseline, Current, and Natural Visibility Conditions

Baseline and current visibility include haze pollutant contributions from human-caused (anthropogenic) sources as well as those from natural sources, using the actual pollutant concentrations measured at IMPROVE monitors during the baseline period of 2000-2004 and the current period of 2014-2018 (Tuxedni current data is from 2012-2014 and 2016-2018, further described in Section III.K.13.D). The state must describe existing (current) visibility conditions on the suite of days that represent the most impaired and clearest days. The state must also establish what the most impaired and clearest days would be like on days when only natural sources affect visibility, without any human-caused impairment. Achieving natural conditions for visibility on the most impaired days by the year 2064 and ensuring no degradation in visibility for the clearest days since the baseline period is the overall goal of the Regional Haze Program (RH Program).

C. Statewide Emissions Inventory of Haze-Causing Pollutants

As with any air quality analysis, a good understanding of the sources of haze pollutants is critical. For the purposes of this RH SIP, DEC will be using one current and one future forecasting inventory. Current inventory to be used is the 2016 inventory compiled by the EPA and multi-jurisdictional planning organizations (MJOs), which was built off the 2014 National Emissions Inventory (NEI). The state will be using the 2028 future forecasting inventory that is built off the 2016 inventory. This inventory uses the most recent emissions data available to project emissions at the end of the second Regional Haze planning period in 2028. Both 2016 and 2028 emission inventories are described in Section III.K.13.E, Emissions Inventories of Alaskan Controllable Sources.

D. Long-Term Strategy

The RH SIP also describes the long-term strategy (LTS) that provides the necessary emission reductions to achieve the RPGs established for each Class I area within Alaska. The LTS contains the state's 10-15 year strategy for making reasonable progress toward remedying existing and preventing future visibility impairment. Federal law mandates a periodic review and, if necessary, revision of the LTS section of the plan at least every five years. This review is incorporated into the 5-year progress report, which will be submitted to the EPA by January 31, 2025, for the second implementation period. Section III.K.13.H describes the measures included in Alaska's LTS.

E. Analysis of Controllable Sources within Alaska

The 1999 RH Rule included a BART requirement to implement a federal mandate to retrofit certain very old sources that pre-date the 1977 CAA amendments by up to 15 years. If it was demonstrated that the emissions from these sources cause or contribute to visibility impairment in any Class I area, then the BART must be installed.

The determination of BART in the original plan took into consideration the costs of compliance, the energy and non-air quality environmental impacts of compliance, any existing pollution control technology in use at the source, the remaining useful life of the source, and the degree of improvement in visibility which may reasonably be anticipated to result from the use of such technology. In Alaska, there were seven facilities that fit the initial BART-eligible criteria. The systematic BART analysis carried out by DEC is detailed in the original 2011 Plan in Section III.K.6, which remains in effect. The 2017 RH Rule does not have a BART requirement for new sources to be added to BART lists.

The new RH Rule requires that states utilize source emissions data from emissions inventories to conduct visibility analyses of sources located near designated Class I areas. These four-factor analyses should be the basis by which states determine which sources need additional controls or measures to meet RPGs. These reviews can be in-depth reviews involving cooperation with sources and detailed analyses to determine which is the best control mechanism based on source visibility contribution. With current visibility at Class I areas in the state, DEC has instead opted to conduct limited four-factor reviews primarily using available data submitted as part of state permitting requirements. These four-factor reviews use much the same criteria as the prior BART requirements. For more information about the facilities and the four-factor analysis conducted, see Section III.K.13.F.

F. Progress-to-date, the Uniform rate of Progress, and Reasonable Progress Goals

RPGs are established by each state for each Class I area as a deciview level to be achieved by the end of the second planning period. The RPGs must assure that the most impaired days get less hazy and that visibility does not deteriorate on the clearest days, when compared with the baseline period. DEC has prepared technical analyses to assess future visibility and provide the context to establish RPGs for the Class I areas during the second planning period.

States must also compare their RPGs to the level of visibility improvement that would be achieved if perfectly linear progress between the current period and expected natural conditions in 2064 were to occur. This linear rate of progress is known as the uniform glide path or uniform rate of progress. The uniform glide path is not a fixed standard that must be met; instead, it simply provides a basis for evaluating the selected 2028 goals. Many factors come into play in determining whether the uniform glide path can be achieved in the current planning period, including the cost and feasibility of controls as well as the appropriateness of the level set for natural conditions in 2064. The RPGs for each Alaska Class I area are presented in Section III.K.13.I.

G. Consultation with States, Tribes, and Federal Land Managers

Preparation of the RH Plan and selection of RPGs requires consultation among states, FLMs, and affected tribes since haze pollutants can be transported across state lines, as well as international and tribal borders. In Alaska, Class I areas are managed by the National Park Service (NPS) and the U.S. Fish and Wildlife Service (FWS). The draft SIP must be available to the FLMs at least 120 days before the public hearing on the final Plan. This allows time to identify and address any comments from the FLMs in the final RH Plan in advance of the public hearing.

Participation in the WRAP has helped to foster a regionally consistent approach to haze planning in the western states and provided a sound mechanism for consultation. DEC has also consulted directly with FLMs during the development of this SIP. The consultation process is explained in detail in Section III.K.13.K.

6. MID-COURSE REVIEW OF PROGRESS, REVISIONS, AND TIMELINES

Following submittal of the initial RH Plan, and every ten years after that, a revised plan must be submitted for the following ten-year period. In the interim, each state is required to submit a five-year progress report to the EPA. Inventory and monitoring data updates, as well as a progress report on emission reductions, are prepared for the mid-course review. As in the initial plan, at the mid-course review Alaska will work and consult with other states through a regional planning process, as funding allows.

The mid-course review also allows each state to assess progress towards its RPGs. As explained in Section III.K.13.H, Alaska's strategy for improving visibility is related to ongoing activities to reduce emissions of criteria pollutants. The current control measures

and incentive programs for stationary, area, and mobile sources contribute measurably to reductions in haze. The second implementation period mid-course review is due in January 31, 2025, and will provide an opportunity to reassess progress in light of these and future programs.