

I. Tribal Data Development Work Group

Under the Regional Haze Rule, and in accordance with the Tribal Authority Rule, tribes are not required to implement any particular provisions of the Rule, but have the option to submit visibility implementation plans or “reasonably severable” elements thereof. Tribes are encouraged to participate in Regional Planning Organizations, and EPA committed to supporting tribal involvement. Tribes within the 9-state GCVTC transport region have the option of submitting 308 or 309 implementations plan, independently of the state in which the tribe is located.

For many issues, more information regarding air quality and emissions on tribal lands is needed in order for tribes to participate in a meaningful way in the WRAP decisions. For example, tribes need to know what sources on tribal lands might be affected by the Annex trading program if it is enhanced to include trading of NO_x and PM. Thus the mission of the TDDWG is to assist the tribes and the WRAP in acquiring the information, and building the tribal capacity, which will be needed for tribes to make informed decisions regarding whether and how to implement visibility TIPs.

Although SIP deadlines do not apply, EPA encourages tribes to coordinate any TIP submittals with states to the extent practicable. Given the less-advanced state of tribal air program development, this means there is a need to develop tribal data capacity as quickly as possible in order to achieve consistency with the 2003 and 2008 time frames.

Workplan Summary

The TDDWG Work Plan contains three Phases, each comprising multiple tasks. The first Phase was the Work Groups organization and start-up, completed in 1999 with the only cost being travel expenses. The Second Phase was to assess the nature of the “tribal data gap” and devise a strategy for “filling” it. This was performed with contractual assistance from the Institute for Tribal Environmental Professionals (ITEP), and recently completed. The resulting report is available on the WRAP web site and hard copies are currently being distributed to WRAP, EPA, and tribal staff. The third Phase is Data Collection and Archiving, which is the object of the current year’s funding.

Several issues critical to bridging the tribal air quality data gap were identified through the TDDWG report:

1. A serious limitation on environmental program resources among the WRAP tribes.
2. A high demand for new and continuing tribal air quality programs in the WRAP region.
3. A high demand to develop tribal emissions inventories.
4. A shortage of tribal staff to deal with air quality issues.

These issues are documented and quantified in greater detail in the report. In order to accomplish Phase III (Data Collection and Archiving) in light of these factors, ITEP is proposing the following tasks, consistent with the TDDWG plan:

Task 1: Completion of Emissions Inventory Software. Coordinate the completion of the emission inventory software for tribes in the WRAP Region. The software will be an EI module compatible with ITEP's existing tribal environmental database, will be developed in conjunction with the WRAP EI Forum and other Forums, and will include GIS functions. The majority of the cost for this task would be for technical subcontractors to be selected by RFP.

Task 2: Quality Assurance/Quality Control. Develop a written QA/QC plan for data collection and data management associated with both the underlying database and emission inventory software.

Task 3: Pilot Test of EI Software. Field test the IE Software and QA/QC plan on three selected tribes, obtain feedback, and work with contractors to modify software as necessary. It is anticipated that software training will be extended to a broader group of tribes under the subsequent year's grant.

Task 4: Compilation of Existing Data. Maintain databases of existing EI's, GIS information, and contact information, and generate reports as directed by the TDDWG or requested by other WRAP Forums.

In addition to these Phase III tasks, ITEP will perform formatting and quality assurance on as many as possible of the 28 tribal emissions inventories identified in the assessment phase, in order to make the EI's compatible with EPA's National Emission Inventory.