



WRAP

TRIBAL NEWS

March 2005

WRAP ACTIVITIES - TRIBAL SYNOPSIS

Tribal Data Development Working Group - The TDDWG submitted its 2006 work plan request to the Planning Team on March 10th and received \$200,000. The work plan can be found at <http://www.wrapair.org/forums/tddwg/docs.html>. Also, the TDDWG and the Emissions Forum will hold a joint April meeting in Anchorage, Alaska. Further information on that meeting, including the agenda, can be found at <http://www.wrapair.org/cal/calendar.php?op=view&id=303>.

Air Managers Committee - Implementation Work Group - The Implementation Work Group met March 8-9 in San Francisco to conduct training on use of the Attribution of Haze report, to work on the outline of the SIP/TIP template, and to review the drafts of the proposed 2006 work plans from several of the WRAP forums. There are three tasks in the 2006 AMC work plan of special interest to tribes:

- *AMC3: Summary of Supplemental Benefits of Regional Haze Controls.* “Supplemental Benefits” includes a look at health impacts of regional haze, an important issue which was first introduced into the AMC by tribal representatives. Funding request: \$15,000.
- *AMC4: Development of TSD “Section” Addressing Visibility Impact to Traditional Tribal Lifeways.* Under this task, a contractor will draft a document explaining some of the ways in which limited visibility may impact tribes, and how a state may work with tribes to incorporate these concerns into its SIP. Funding request: \$10,000.
- *AMC5: Workshops on Effective Collaboration.* A series of workshops aimed at more effective collaboration between states and tribes within the WRAP process. Funding request: \$20,000.

The full text of the 2006 AMC work plan is available on the WRAP web site at <http://www.wrapair.org/forums/amc/docs.html>.

The Planning Team - The Planning Team met March 9-10 in San Francisco to address long-term planning and administrative issues, such as annual WRAP work plans and the WRAP strategic plan. While the WRAP’s share of the Regional Organization Planning (RPO) budget was slightly more than \$3 million for FY05, the share is likely to decrease in FY06 and beyond. This is due to the Administration’s proposed RPO budget for FY 2006 which was cut in half, from \$10 million to \$5 million. The WRAP hopes, however, that some of this money might be reacquired through congressional action. If no such additional funding is forthcoming, the

WRAP and its partners anticipate that there will be little or no funding for contractor support of technical work beyond that needed to fulfill needs for the 2007 SIP/TIP submittals. The goal of the WRAP is therefore to finish all technical work needed by mid-2006.

The following chart gives an overview of all WRAP work plans for 2005 and 2006.

February 2005 Status Report - Pending Projects		FY05 Grant		
		2005	2006	2007
STATIONARY SOURCES				
Regional Stationary Source Strategy Development	300,000	108,000		
FIRE				
Fire Tracking System / EDMS Support	85,000	50,000	50,000	
Regional coordination of smoke management programs	50,000			
Smoke Mgmt Technical and Policy Workshop	25,000			
Assessment of Apportionment Methods	25,000			
Feasibility Criteria for WRAP Fire Policies	60,000			
MOBILE SOURCES				
Offroad Retrofit Program	100,000			
ECONOMIC ANALYSIS				
Development of Baseline Economic Data	55,000			
Enhancement of Cost and Benefit Unit Values	50,000			
Screening Tool	20,000			
Economic Assessment Capability	130,000			
MODELING				
2005 RMC Support	500,000	500,000		
EMISSIONS				
2005-2007 EDMS Hosting / Operation	55,000	180,000	180,000	
EDMS Enhancements		128,000		
Support for Control Strategy Analysis		75,000		
TRIBAL DATA				
Emissions Data Development Support	103,000	200,000		
Continue Emissions Inventory & TEISS Technical Support	98,000			
DUST				
Enhanced Ambient Data Analysis - CoH	50,000			
Update Handbook		20,000		
Pilot Project -NM		80,000		
Addition to Fine Fraction	30,000			
AMBIENT MONITORING AND REPORTING				

Causes of Haze		225,000	100,000
ATTRIBUTION OF HAZE			
Phase 2 Technical Support Contractor	75,000		
WIGIMS Implementation	167,000		
TOC			
Land Use Database		50,000	
AIR MANAGERS COMMITTEE			
Contractor Assistance	130,000		
State Caucus Coordinator	120,000	120,000	
Health and Environmental Assessment of Haze-Related Improvements	15,000		
Traditional Tribal Practices and Regional Haze	10,000		
308 Implementation Work Group - State and Tribal Support	76,000		
Workshops on Effective Collaboration	35,000		
COMMUNICATIONS COMMITTEE			
Public Outreach and Communication on WRAP Issues	55,000		
Web Site Maintenance	23,500	25,000	
Subtotal for Pending Projects	2,442,500		
	Contract Subtotal	2,091,000	
	NTEC	525,000	
	WGA	320,826	
	Total	2,936,826	
	Available	2,936,826	

Attribution of Haze Working Group - The Attribution of Haze project will result in a 2005 report describing the emissions source categories and geographic source regions presently contributing to visibility impairment at each mandatory Federal and Tribal Class I area within the WRAP region. The Phase I draft report was presented at the joint Stationary Sources Joint Forum/Implementation Work Group meeting last December. Planning for Phase II work has begun and it is expected work will begin on this phase in mid-2005. Along with recommended changes to format, Phase II will incorporate more complete base-year emissions and modeling data, as well as 2018 impact analyses. Phase II is scheduled for completion in 2006.

Fire Emissions Joint Forum - The Fire Emissions Joint Forum (FEJF) was formed to assist the WRAP in addressing the Grand Canyon Visibility Transport Commission's ([GCVTC](#)) recommendations on fire. The term fire refers inclusively to wildfire, prescribed natural fire/wildland fire managed for resource benefits, prescribed fire, and agricultural fire. The Forum is addressing a broad definition of smoke effects which includes consideration of public

nuisance, public health and visibility/regional haze and creating a *Guidance for Categorizing Natural and Anthropogenic Fire Emissions Handbook*.

Guidance for Categorizing Fire: The Fire Emissions Joint Forum is moving toward adoption of a *Guidance on the WRAP Policy for Categorizing Fire Emissions*. This guidance is meant to assist burners and regulators implement the annual tracking system requirement, and to report all fires as either “natural” or “anthropogenic” according to the Policy.

Some refinements are needed to the guidance document for implementing the WRAP policy on fire categorization. One issue discussed by the FEJF was interpretation of how to re-categorize escaped prescribed fire as “natural,” consistent with EPA policies on “natural events and wildland & prescribed fire”. This will be clarified in the guidance. The FEJF is also required to develop guidance for developing the regional coordination element of smoke management programs. The “Regional Coordination” document is out in draft form and is being reviewed.

There are several tribal-specific issues that have been brought up with regard to this guidance document. A conference call to discuss these issues will be held March 31. If you have not received an e-mail regarding this call and would like to participate, contact Ken Cronin, Tribal Caucus Coordinator, at 505-242-2175 or kcronin@ntec.org.

Some tribes have reviewed the “Regional Coordination” document and sent in comments. Thanks to Nez Perce, Yurok, Zuni, Ely Shoshone and Northwestern Band of Shoshone for their hard work and diligence with respect to this task.

Mobile Sources Forum - Emission improvements: No significant activities to report at this time. *This forum does not have a tribal component to its work and has no active tribal participation on its forum.*

Stationary Sources Joint Forum - The Stationary Sources Joint Forum (SSJF) focuses more broadly on stationary source issues throughout the WRAP and their relationship to Section 308 SIP/TIP requirements. Major topics for the SSJF include BART, reasonable progress for stationary sources, technical analyses, and evaluating the effects of and integration with other regulatory and legislative developments at the national level.

EPA has proposed rulemaking to re-evaluate NO_x increments in Class I areas affected by new or modified major stationary sources. This action is pursuant to a 1990 court order to harmonize the statutory criteria of the Clean Air Act pertaining to pollutant-specific PSD requirements. PSD NO_x increments were first established in 1988. A number of questions exist about implications for regional haze programs under the market trading and/or state planning options. The forum was undecided as to whether it should recommend that the WRAP comment on the EPA Rule. The forum is aware of WESTAR activity on PSD issues, and would recommend any action related to this proposal be coordinated with WESTAR. Additional clarification on the proposal is needed and will be obtained.

The forum is evaluating the status of NO_x controls on existing “electrical generating units”. The contractor, Eastern Research Group (ERG), has been surveying available databases to identify by

state all electrical generating units in the West, their NOx emissions, types of NOx emission reduction technologies applied, and their effectiveness. The project will also include a section on enhanced controls and their applicability as retrofit systems to existing units. Some issues include capital and operating costs, reasonable applicability across different boiler types, and fuel qualities. This is the initial information-gathering phase. The SSJF will later consider which of the available technologies to base emission strategies on, and which parameters to look at (i.e., percent reduction, emission limits, defined technology). ERG is also gathering information on oil and gas emissions, and will be working on 2018 stationary source emission projections.

The “Oil and Gas Emissions Inventories” project for tribes is progressing. Navajo, Colville, Ute Mountain Ute, Wind River and Warm Springs Reservation have all agreed to work with the contractors and create emissions inventories.

Communications Committee - The children’s handout developed by the Communications Committee is now available in a downloadable format on the WRAP website. The committee developed the handout “What Can You Do to Help Prevent Air Pollution?” as a fun and colorful method of making children aware of how their actions can affect the air we breathe. To view or download the handout, please go to <http://www.wrapair.org/kids>. The page also contains links to other environmental organizations’ children’s pages.

Economic Analysis Forum - As a complement to the economic analysis framework recently developed by the Economic Analysis Forum (EAF), the forum’s members expect to develop a screening tool for use against the aforementioned framework in order to remove those air pollution control strategies that are economically prohibitive for a given tribe or state, and to focus on more reasonable options. Two products from this task will be a template and a cookbook for screening various control strategies. After completing development of the screening tool, the forum will run a few test cases to discern whether the tool works and to ensure that the final tool is something useful and meaningful for the WRAP and its partners.

CEED Case - On February 18, a three-judge panel of the D.C. Circuit Court of Appeals ruled in favor of the Center for Energy and Economic Development (CEED) on its petition for judicial review of the U.S. Environmental Protection Agency (EPA) promulgation of the §309 Annex to the Regional Haze Rule. The court granted the petition, ruling that the EPA method of calculating the benefits of BART was similar to that which was thrown out in the previous case of American Cornrowers, Et Al vs. EPA, and that this similarity “fatally taints” EPA’s rule. The faulty BART calculation was used as the benchmark to show that the five-state SO2 milestone/backstop trading program in the Annex is “better than BART.” The court did affirm in the ruling that the Clean Air Act allows states to develop alternatives to BART instead of case-by-case BART to meet the BART requirement of the Regional Haze Rule.

See:

www.wrapair.org/forums/mtf/documents/group_reports/ANNEX/final/Annex_BART_Decision_05.02.18.pdf

The full scope of this decision is still unclear, and the effects are under review by EPA and states, along with next steps. The five §309 states and the City of Albuquerque have indicated in

a letter to Jeff Holmstead their intent to work with EPA to resolve the deficiencies. See: <http://www.westgov.org/wga/testim/holmstead-ltr3-3-05.pdf>

This action may be of concern to tribes who are trying to decide whether to adopt a §308 or §309 TIP. Some clarification should come on April 15th, when the EPA releases its alternative calculation method in response to the Corngrowers' ruling.

This monthly newsheet is a collaboration of the National Tribal Environmental Council's (NTEC's) air program staff assigned to work with the Western Regional Air Partnership (WRAP), and condenses for the reader the activities and issues of the various forums, committees, and workgroups of the WRAP as they pertain to the tribes within the WRAP region. Funded by the U.S. Environmental Protection Agency, the purpose of the WRAP is to develop data, tools, and policies needed to improve visibility in parks and wilderness areas across the West. If you have questions or suggestions regarding this newsheet, please contact Sandra Sac Parker, Editor and NTEC air program communications specialist, at 505/242-2175 ext. 104 or e-mail sparker@ntec.org.

