



WRAP

TRIBAL NEWS

February 2005

WRAP TRIBAL SYNOPSIS

The Planning Team: The Planning Team convenes as needed to address long-term planning and administrative issues, such as annual WRAP workplans and the WRAP strategic plan. Some of the functions performed by the Planning Team were previously performed by the Coordinating Group, which no longer exists. A record of Coordinating Group activities can be found on the prior meetings and calls page of the Planning Team portion of WRAP's website (www.wrapair.org). The Planning Team will meet March 9 and 10 in San Francisco specifically to discuss budgets and workplans for 2005-2007. Tribal representatives are strongly encouraged to attend.

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 on December 14. It is now open for review and comment until February 11, with the final draft due by the end of that month. From initial responses, it is likely that training in how to use the report will be needed. Planning for Phase II work has begun and it is expected work will begin on Phase II 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.

Emissions Forum: The Emissions Forum oversees the development of a comprehensive emissions tracking and forecasting system which can be utilized by the WRAP or its member entities. This system monitors the trends in actual emissions and forecasts the anticipated emissions resulting from current regulatory requirements and alternative control strategies. The Emissions Data Management System (EDMS) is a work project of the Emissions Forum and includes Emissions Inventories (EIs) submitted by tribes. Those tribes that do not have EIs or do not wish to submit EIs will be gap-filled to populate the EDMS.

The EDMS was turned on for public access in January 2005. (See www.pechan.com/edms). Planning is underway to maintain the system and augment the EDMS capabilities. A major piece of this is the Fire Emissions Joint Forum's (FEJF's) desire to enable the EDMS to handle day-to-day fire emission tracking for smoke management and annual emission goals, in addition to handling fire emissions for

modeling purposes. The FEJF determined that it is not ready to approve the go-ahead with this next step, and decided it would prefer to re-bid rather than extend the existing contract.

Mobile Sources Forum-Emission Improvements: The Mobile Sources Forum (MSF) investigates and recommends mobile source emissions control measures. In other Emissions Forum business, ENVIRON is developing updated on-road and off-road mobile source emissions inventories by county for the 2002 base year and for three future years - 2008, 2013, and 2018. To construct these inventories, ENVIRON is surveying state and local air quality planning agencies and also metropolitan planning organizations (MPOs) to obtain the most up-to-date mobile source activity data and control program information. The staff for this forum has requested tribal participation but has been unsuccessful. This forum does not have a tribal component to its work and has no active tribal participation on its forum.

Fire Emissions Joint Forum: The Fire Emissions Joint Forum (FEJF) was formed to assist the Western Regional Air Partnership 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 has created a *Guidance for Categorizing Natural and Anthropogenic Fire Emissions Handbook*. See the brief discussion above regarding the FEJF desire that the EDMS be capable of managing day-to-day emissions tracking. This will require additional development work. The FEJF will consult with the Emissions Forum on the approach to this and possibly pool resources to develop a daily fire tracking add-on to the EDMS. The FEJF has sent out quality assurance packets of information to tribes that have fire components in their programs of work. They are currently sending out QA/QC packets on tribal wildland fire and prescribed fire to tribes with more than 500 tons per year of emissions. January 31 was the deadline for tribes to respond to the QA/QC packets.

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 required to develop guidance for developing the regional coordination element of smoke management programs.

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 effect of and integration with other regulatory and legislative developments at the national level. EPA promulgation of eastern-state CAIR has been delayed a few months to allow another

attempt to get a Clear Skies legislative package underway. It is unclear how, if at all, this will lead to proposals for a federal market-trading program for the West.

The most significant SO₂ and NO_x emitters are large stationary sources, particularly electric generating facilities. Thus, SO₂ and NO_x will be the primary focus for much of this work. Another focus will be the rapidly expanding oil and gas sources. Work will include current and projected emissions, evaluation of control technologies, policies related to alternatives to BART, including market trading of SO₂ and NO_x. Work is to be completed by September. This forum has contractors working with tribes to inventory tribal point sources plus oil and gas emissions inventories. This group will also be the frontrunner to developing a market trading program that has the potential to evolve into a national cap and trade program. It would be in the best interests of tribes to become involved in this forum in order to advocate for tribal set-aside allocation in a possible cap and trade program.

The draft BART Identification Report came out on February 15, 2005.

309 Annex Court Case: The District Court of Appeals hearing the Center for Energy and Economic Development (CEED) challenge to EPA promulgation of the 309 Annex rule has requested further briefs addressing what ‘inducements’ EPA created by its promulgation have caused the states to adopt emissions limits to comply, and do such inducements harm the petitioner (CEED). Thus the court is asking questions related to standing of the petitioner to challenge. It is not known what this means regarding a possible ruling.

Air Managers Committee Implementation Work Group: Work continues on developing a “Roadmap/Template” for the 308, 309(g) SIPs and TIPs. Also, the IWG is positioning to provide feedback on the Attribution of Haze Report and on the upcoming 2006 workplans from the other forums.

Final Draft Tribal-EPA Protocol, Regional Haze TIP Development and Rulemaking Action; The draft EPA-Tribal Protocol is intended to facilitate a collaborative process of developing, reviewing and implementing Section 308 Tribal Implementation Plans (TIP) under the Regional Haze Rule. The protocol contains the commitments and expectations for both the EPA and tribes involved in the TIP process. This document is out for a sixty-day review. Please send all comments to Rosanne Sanchez (rsanchez@ntec.org) no later than 03/11/05.

Dust Forum: In the summer of 2002, the WRAP Oversight Committees established a Dust Emissions Joint Forum (DEJF) to consolidate the WRAP's efforts involving dust. Previously, three forums had worked on dust issues: the Mobile Sources Forum, the Research and Development Forum, and the Emissions Forum.

The new DEJF is concentrating on improving how dust emissions are estimated and subsequently treated by air quality models.

Communications Committee: At its December meeting in San Francisco, the Communications Committee established a workgroup for tribal outreach, including member tribes and those not yet members. The workgroup consists of Lisa Riener, Air Quality Program Manager for the Quinault Nation; Daniel Clark, Small Business Ombudsman with the Wyoming Department of Environmental Quality; and Sandra Sac Parker, NTEC air program communications specialist. Both Lisa and Dan serve as committee co-chairs, while Sandra is the NTEC staff person designated as the primary contact to work with the Communications Committee. All suggestions, ideas, etc., are welcomed and may be sent to Sandra at 505/242-2175 or sparker@ntec.org.

Economic Analysis Forum: The Economic Analysis Forum (EAF) is vested with the responsibility discerning the econometric parameters needed to forecast changes in emissions, and assessing the economic effects of pollution controls on a regional, tribal and state level. With the assistance of BBC Research & Consulting, the EAF is conducting an application test of an economic analysis framework tool developed in 2004 that prescribes a method for assessing the costs, benefits and distributional issues associated with regional air quality control strategies. The application test is being conducted for three states (Arizona, Montana, and North Dakota) and three tribes (Confederated Salish and Kootenai Tribes, Salt River Pima-Maricopa Indian Community, and Spirit Lake Nation). The purpose of the test application is to demonstrate the capabilities of the framework and economic analysis in general, and to refine the framework where appropriate.

In Fall 2003, the five regional planning organizations (WRAP, CENRAP, Midwest RPO, VISTAS, and MANE-VU) agreed to fund a User Requirements and Detailed Systems Document to support the design and development of a national tribal economic information management system. The project is beginning and will be managed by the National Tribal Environmental Council. The primary purpose of this system is to serve as an analytical tool for assessing the economic impact, and cost of air pollution regulations and other related scenarios on tribes and states. The final design should allow each regional planning organization to implement a system individually but also have compatibility with similar systems established by other such organizations.

Tribal Data Development Working Group: The Tribal Data Development Work Group (TDDWG) is assisting and advising the WRAP on gathering tribal air quality data and other air quality issues related to the WRAP mission from tribes in the WRAP area. The TDDWG is working with the other WRAP forums and non-tribal entities to improve the understanding of tribal protocols and processes for obtaining and using tribal data. In addition to assisting in gathering existing air quality and air emissions data, the TDDWG is working on filling data gaps in Indian Country. The TDDWG created a work product called TEISS (Tribal Emissions Inventory Software System), developed by Lakes Environmental, that helps to create or update tribal emissions inventories and ensure they are properly formatted to upload to the National Emissions Inventory (NEI) housed at the U.S. EPA. The software is free to tribes who wish to utilize this valuable software. The TDDWG has also provided the funding to allow tribes to attend training to learn how to use TEISS, free of charge.

The TDDWG is working on a joint project with the Emissions Forum to ensure tribal data gaps in the EDMS are filled with existing tribal emissions inventories and to ensure place holders are created for those tribes who wish to submit their tribal emissions inventories in the future. The TDDWG is also working on a joint project with the SSJF to ensure tribal point source emissions inventories, and oil and gas inventories, are created and/or utilized by the SSJF project.

2006 Workplan and Budget: The EPA has allocated about \$3 million for WRAP work through 2006. The grant application process has been accelerated to begin early 2005. This will be the year in which the final WRAP work products should be completed in order to meet the state SIP submittal schedule. WRAP forums and workgroups should examine all ongoing and pending projects, along with projected new projects for priorities, to ensure the essential work is completed on time.

This is the first edition of a monthly newsheet, brought to you by the National Tribal Environmental Council air program, which condenses for the reader the activities and issues of the various forums, committees, and workgroups of the Western Regional Air Partnership (WRAP) as they pertain to the tribes. Funded by the U.S. Environmental Protection Agency, the purpose of the WRAP is to develop data, tools, and policies needed by states and tribes to improve visibility in parks and wilderness areas across the West. WRAP is staffed by the National Tribal Environmental Council (for the tribes) and by the Western Governors' Association (for the states). 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.