



WRAP

TRIBAL NEWS

February 2006

Prospective Budget Cuts for RPOs in FY07

On February 6, the President introduced his Administration's proposed budget for FY07 which includes a \$2.5 million reduction in existing funding for Regional Planning Organizations (RPOs). For the past few years, the five RPOs (WRAP, CENRAP, Midwest RPO, VISTAS, and MANE-VU) have been funded at a level of \$10 million, but were reduced to a funding level of \$5 million in FY06. The overall effect of this budget reduction is currently being assessed by each RPO, but this will likely have an adverse impact on tribes in the West which have benefitted from the WRAP partnership through the development of such tools at the Tribal Emissions Inventory Software Solution (TEISS). Please stay tuned as more discussion about this matter takes place on a number of different levels.

WRAP Technical Support System Available for Viewing

As the federal deadline for state regional haze implementation plans nears (December 2007), a team of individuals has been working diligently to create a one-stop shop for presenting the technical data (e.g., emissions, modeling, and monitoring data) and analytical results that the WRAP has collected. This central location, known as the Technical Support System (TSS) and viewable at <http://dubhe.cira.colostate.edu/tss/>, is intended to support the air quality planning needs of western states and tribes, and will be maintained and updated to support both the implementation of regional haze plans and other western air quality analysis and management needs. Tribal representatives are encouraged to periodically review the TSS as it is updated and refined, and as standard and user-specified maps, charts, tables, and graphs become available.

Final "2002 and 2018 Point Source and Oil & Gas Area Source Inventory for Tribes"

Report Published. On behalf of the Stationary Sources Joint Forum (SSJF) and the Tribal Data Development Work Group (TDDWG), ERG and Environ have developed point and oil and gas area source emission inventories for seven Native American Reservations (NARs) and/or tribal lands in the WRAP region (Arapahoe and Shoshone Tribes of the Wind River Reservation, Confederated Tribes of the Colville Reservation, Confederated Tribes of the Warm Springs Reservation, Navajo Nation, Tohono O'odham Nation, Ute Mountain Ute Tribe, and Confederated Tribes and Bands of the Yakama Nation). The report contains methods, data, and results pertaining to point source and oil and gas area source emissions for 2002 and 2018 for these tribal entities. Appendix E is a zipped file containing a spreadsheet with the 2018 point source calculations. Please contact [Tom Moore \(MooreT@cira.colostate.edu\)](mailto:MooreT@cira.colostate.edu) with questions and comments.

- Report + Appendices A-D [PDF](#) (1/26/06)
- Appendix E [ZIP](#) (12/21/05)

Next Steps for BART - CALPUFF Modeling

At the Feb. 1-2 WRAP Stationary Sources Joint Forum in Denver, it was decided that the WRAP Regional Modeling Center (RMC) would be assisting the WRAP states by doing CALPUFF modeling for each individual BART-eligible source for which the states have not already done so. This model is used to establish whether a source that otherwise meets the BART requirements (age, size and type of source, etc) actually “causes or contributes” to visibility impairment by a factor of 0.5 deciviews. The question raised by NTEC is whether there are tribes that would want this modeling as well. NTEC will be contacting tribes with BART-eligible sources over the next month or so. If you are interested in participating in this project, please contact Ken Cronin (kcronin@ntec.org).

2002 and 2018 Baselines Emissions Summary

The tables below summarize the percentage of regional haze pollutants in the WRAP region that has been attributed to sources on tribal lands for both the 2002 baseline and 2018 projections. As you can see, more than eight percent of the NO_x and nearly five percent of the SO₂ have been attributed to tribal sources. If you would like more details on these figures, you can find the complete tables at <http://www.wrapair.org/forums/ssjf/documents/eiccts/index.html>.

	NOX (Ton)	SO2 (Ton)	VOC (Ton)	CO (Ton)	PM10-PRI (Ton)	PM25-PRI (Ton)	NH3 (Ton)
<i><u>2002 Area Source Emissions:</u></i>							
Tribal Emissions (tons)	2,932	49	8,472	283	1,978	398	0
Total WRAP Emissions (tons)	404,749	103,577	1,814,439	1,356,163	1,861,810	530,289	25,034
% Tribal Emissions	0.7%	0.0%	0.5%	0.0%	0.1%	0.1%	0.0%
<i><u>2002 Point Source Emissions</u></i>							
Tribal Emissions (tons)	87,215	38,208	1,710	6,297	6,342	3,006	125
Total WRAP Emissions (tons)	1,058,702	824,265	266,583	565,383	159,892	63,723	12,352
% Tribal Emissions	8.2%	4.6%	0.6%	1.1%	4.0%	4.7%	1.0%

<i><u>2018 Area Source Emissions</u></i>							
Tribal Emissions (tons)	6,639	2	18,240	564	2,062	412	0
Total WRAP Emissions (tons)	617,116	124,136	2,777,068	1,487,257	2,208,103	681,071	26,075
% Tribal Emissions	1.1%	0.0%	0.7%	0.0%	0.1%	0.1%	0.0%
<i><u>2018 Point Source Emissions</u></i>							
Tribal Emissions (tons)	92,580	32,895	2,864	12,988	7,749	3,206	125
Total WRAP Emissions (tons)	1,107,708	832,693	333,083	862,693	197,226	79,572	15,977
% Tribal Emissions	8.4%	4.0%	0.9%	1.5%	3.9%	4.0%	0.8%

WRAP Submits Comments on EPA's Draft Reasonable Progress Guidance

On February 10, the WRAP Co-Directors submitted comments on the U.S. Environmental Protection Agency's (EPA's) draft guidance for setting reasonable progress goals. The purpose of the guidance is to supplement the requirements of the Regional Haze Rule (RHR). More specifically, the RHR requires states to set reasonable progress goals for each mandatory Federal Class I area within the state. In doing so, states must take into consideration several factors specified by Congress in the Clean Air Act – the “statutory factors.” These factors include the costs and time required for compliance, the remaining useful life of the (pollution) sources, and the energy and non-air impacts. The guidance would provide more information on how to take these factors into account.

The WRAP's comments included a call for more clarity in the following areas:

- The consultation process to be used to address issues of cross-border impacts on Class I areas, and the role of tribes in this process.
- The interplay of the reasonable progress goals and the proposed PM-coarse NAAQS.
- The application of the factors to “non-traditional” sources (e.g., fire, dust, and area sources).
- Consideration of international and natural sources in setting the goals.

The draft guidance is not being developed through a formal rule-making process – it was not published in the Federal Register or subjected to an official notice and comment period. Accordingly, it cannot be legally binding on tribes and states, even if the draft is finalized. However, the guidance could provide states with direction for complying with RHR requirements, and at a minimum, provide a common understanding among tribes, states, EPA, and others as to what issues are raised by those regulatory requirements.

Whether or not the EPA revises the draft guidance according to the WRAP's comments, the setting of reasonable progress goals will be a critical step in determining the stringency of the regional haze program. Therefore, we strongly encourage tribes to get involved with these issues.

At the time of this writing, neither the draft guidelines nor the WRAP comments appear to have been posted to the web. Please contact Ken Cronin, Bob Gruenig, or Bill Grantham if you would like a copy.

Upcoming meetings

- Planning Team meeting – Feb. 22 and 23 in Salt Lake City, Utah. Tribal Co-Chairs of the Initiatives Oversight Committee (IOC), Technical Oversight Committee (TOC), Air Managers Committee (AMC), TDDWG and Communications Committees have been preparing for the upcoming Planning Team meeting. While the FY2007 budget cuts loom on the horizon, an additional \$475,000 has been identified as available for new projects within WRAP (made available mostly from a shift from the NTEC and WGA administrative budgets to the project side of the ledger). The TDDWG has two proposals that it will be submitting for approval. It is anticipated that there will be increased scrutiny of tribal projects as the 2007 SIP deadlines approach and the funding gets tighter.
- Joint TDDWG/Inter-RPO Tribal Workgroup meeting – March 14 in Albuquerque, New Mexico. The Tribal Data Development Work Group (TDDWG) will hold its quarterly meeting in conjunction with the first in-person meeting of the Inter-RPO Tribal Workgroup. The TDDWG meeting will include discussions about the workgroup's 2006 projects and updates provided by Institute for Tribal Environmental Professionals (ITEP) personnel concerning their work on behalf of the TDDWG. The afternoon will largely consist of a roundtable discussion among representatives of the five RPOs, sharing their stories and discussing next steps that should be taken by the RPOs to address tribal needs and concerns with respect to regional haze efforts. For hotel information go to <http://www.wrapair.org/cal/calendar.php?op=view&id=501>.
- WRAP Tribal Policy and Technical Workshop - March 15 and 16 in Albuquerque, New Mexico. This is the second event of this kind (the first one was held in September 2003). Audience participants will have an opportunity to learn about the WRAP, its activities, and how some of the tribes' needs and concerns are being addressed. Travel information can be found at <http://www.wrapair.org/cal/calendar.php?op=view&id=502>. Questions may be forwarded to Ken Cronin via phone (505-242-2175 ext. 115) or e-mail (kcronin@ntec.org).

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. WRAP - a partnership of the western states (including Alaska), tribes within those states and other stakeholders - is funded by the U.S. Environmental Protection Agency, with the purpose of developing data, tools, and policies needed to improve visibility in parks and wilderness areas across the West. More information on WRAP may be found on its website, www.wrapair.org, while NTEC's website is located at www.ntec.org. 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.

