Appendix A. Support of Tribal Air Quality Capacity and Tribal Implementation Plan (TIP) Development

Background

Similar to states, tribal governments manage air quality and address air pollution within their reservations and are concerned about air pollution that affects tribal health and welfare. In addition to regional haze, tribes in the west are concerned with many other aspects of air quality and the Clean Air Act, such as climate change, air quality monitoring, submission of monitoring and emissions inventory data to EPA, particulates, ozone, air toxics and hazardous air pollutants, atmospheric deposition (critical loads, nitrogen, mercury), smoke management, fugitive dust, permit reviews, NAAQS designations, renewable energy, energy efficiency, coal, oil and gas train transport, oil and gas development, cap and trade programs, and SIP, FIP, and TIP development. The WRAP recognizes that air quality impacts occur for individual tribes.

Tribes use sovereign authority and the CAA to administer air quality programs. There are various regulatory and non-regulatory options available to tribes under the CAA. Tribes can develop a TIP, be delegated authority to help administer a FIP, or operate a program under sovereign authority. Tribes also administer CAA projects and conduct air quality monitoring, research activities, education and outreach. Each tribe is unique and the best approach to implement the CAA and protect air quality may be different from one tribe to another. As with states, all regulatory options require tribes to have the capability to effectively implement an air quality program. Unlike states, not all tribes have funding to operate an air quality program but are still affected by and have a need to address air quality issues.

Tribes, along with states and federal agencies, were full partners in the WRAP as it was formed in 1997, having equal representation on the WRAP Board as states. That equal representation between states and tribes on the WRAP Board remains in place today. Despite this equality of representation on the Board, tribes are very differently situated than states. There are over 400 federally recognized tribes in the WRAP region, including Alaska. The sheer number of tribes makes full participation impossible. Moreover, many tribes are faced with pressing environmental, economic, and social issues, and do not have the resources to participate in an effort such as the WRAP, however important its goals may be. The tribes that are members of the WRAP, and their representatives, make their best effort to ensure WRAP products are in the best interest of the tribes, the environment, and the public.

Most WRAP accomplishments since 1997 benefitted both states and tribes, including, regional haze analysis, the Technical Support System (TSS), smoke management program recommendations, the Fire Tracking System (FETS), and various training opportunities.

In addition to the numerous technical and policy assistance documents and tools developed by the WRAP for the benefit of both states and tribes, a number of projects were accomplished specifically for tribes.

These include:

* EPA-Tribal Protocol, Regional Haze TIP Development and Rulemaking Action. <http://www.wrapair.org/tribal/FINAL_EPA-Tribal_Protocol.pdf>
* Section 309 Tribal Guidance Document, developed to assist tribes within the nine-state region (AZ, CA, CO, ID, NV, NM, OR, UT, WY) to develop regional haze implementation plans. <http://www.wrapair.org/SIPStatus/309/documents/FinalDocs/040917FINAL_TIP_Guide.pdf>
* Model TIP Template for Section 309. <http://www.wrapair.org/SIPStatus/309/documents/FinalDocs/FINAL_TIP_TEMPLATE.pdf>
* Recommendations to tribes on increasing the generation of electricity from renewable resources on American Indian lands. <http://www.wrapair.org/forums/ap2/projects/tribal_renew/Tribal_Renewables_Report_7-03.pdf>
* Recommendations to tribes on implementing energy efficiency measures and programs. <http://www.wrapair.org/forums/ap2/projects/tribal_renew/TribalEEReport_7-03.pdf>
* Analysis of Tribal Allowance Set-Aside in WRAP Proposed Market Trading Program. <http://www.wrapair.org/forums/tddwg/documents/NTEC_Summary1_v3.pdf>
* The Tribal Data Development Working Group (TDDWG) facilitated the collection of data related to air quality on tribal lands, including information on sources of air pollution on or near reservations, tribal ambient air quality data, and demographic information, which may be used to project air quality into the future. The WRAP recognized that the absence of data made it difficult for tribes to assess the effects of proposed policy on tribal lands and economies. The mission of the TDDWG was to facilitate the development and collection of tribal air quality-related data in a manner that respected the interests of tribe, including the protection of sensitive information. Among their many work products, the TDDWG conducted a comprehensive assessment of the tribal air programs in the West and developed the innovative Tribal Emissions Inventory Software Solution (TEISS), a software program that provides tribal staff with a tool to assist in developing electronic inventories of emissions.

Past state and tribal coordination on WRAP activities has also helped develop positive working relationships for current coordination and collaboration efforts. For example, the Idaho Department of Environmental Quality (IDEQ) provides the area source emissions inventory for Idaho tribes, coordinating with the tribes and the Institute for Tribal Environmental Professional (ITEP) on NEI submissions; Washington State Department of Ecology (ECY) assists Washington tribes with their PM2.5 monitoring network; and tribes can attend WESTAR inspector trainings.

Statement of Work

For the continued successful operation of the WRAP organization and to meet WRAP’s goals and objectives, work to ensure continued support for developing and implementing tribal capacity, including:

* Improving the ability of tribes to assess their air quality conditions and to develop strategies to address air quality issues as part of the larger regional planning process; and
* Increasing the ability of tribes to protect and manage their natural resources and communities.

Objectives and Deliverables

**Objective A: Strengthen and support tribal involvement in the WRAP** to ensure WRAP technical and planning work activities appropriately address tribal concerns, data needs, data gaps, and air quality planning needs, and are consistent with the WRAP Charter.

**Deliverables:**

1. Form a Tribal Data Working Group (TDWG) initially comprised of the tribal representatives on the Technical Steering Committee (TSC). The TSC will assist the TDWG with project initiatives and track the Working Group’s efforts for the Board and Membership. The TSC will meet at least twice per year, and a TDWG call will be scheduled two weeks in advance of the TSC meetings in order for the TDWG members to discuss upcoming agenda items and related tribal concerns and needs in preparation for the TSC meeting.
2. Coordinate work with WRAP member tribes:
   1. WRAP staff maintains up-to-date contact list of WRAP member tribes and their representatives. Coordinate list with ITEP and the National Tribal Air Association (NTAA).
   2. WRAP staff provides at least quarterly WRAP activity updates to WRAP member tribes via email summaries or links to summaries. [This item is the same as B.4. and may be combined with A.4.a.]
   3. Hold regular conference call meetings for WRAP member tribes, at least quarterly. Meetings may occur more frequently as needed as specific work projects and needs arise that need member tribe involvement and feedback (e.g., in preparation for a TSC meeting). Two quarterly calls will be scheduled two weeks in advance of WRAP Board meetings. Provide updates on WRAP work and gather feedback from member representatives.
   4. Hold in-person WRAP Board member tribal caucus meetings at WRAP Board meetings twice per year.
   5. Provide updates on WRAP work and gather feedback from member representatives at venues identified in A.3 (and as travel funding is available).
3. Identify opportunities for interaction with tribes and tribal environmental professionals at scheduled WRAP, EPA and tribal meeting and conference venues, including:
   1. EPA Region 10’s Twice-yearly Tribal Air Quality Program Meeting, April 22-24, 2014, Seattle. [Completed]
   2. 2014 National Tribal Forum on Air Quality: May 13-15, 2014, Anacortes, WA. [Completed]
   3. EPA Region 9’s Annual Tribal Environmental Conference, Oct. 14-16, 2014, Sacramento, CA.
   4. Tribal Climate Change Adaptation Training and North Pacific Landscape Conservation Cooperative (NPLCC), Tribal and First Nations Committee Meeting Sept. 2-4 in Portland, <http://www4.nau.edu/itep/climatechange/docs/PreReg-CCAdaptOR-090214.pdf>.
   5. 2014/2015 NTAA meetings: date and location TBD (Anchorage, AK in October or February, coinciding with either Alaska Federation of Natives Oct. 23-25, 2014, Alaska December 2014’s AK BIA meeting, or February 9-13, 2015 AK Forum on the Environment in Anchorage).
   6. Alaska Tribal Conference on Environmental Management, October 28-30, 2014, in Anchorage, AK, <http://atcemak.com/>.
   7. EPA Region 8 Annual Tribal Environmental Conference in 2015, date and location TBD.
   8. 2015 National Tribal Forum on Air Quality: date and location TBD.
4. Provide ongoing opportunities for other tribes to join the WRAP, making sure non-member tribes know the “door is always open” for WRAP membership.

a. Distribute a mass email, at least quarterly, using western region tribal air quality program networks and contact lists (e.g. through NTAA representatives in the WRAP region). Email will include WRAP updates and opportunities for feedback and involvement. [This item may be combined with A.2.b. and B.4.]

b. At venues identified in A.3, and as travel funding is available, provide updates on WRAP work and gather feedback from tribal representatives, and provide information on how to become involved in the WRAP.

**Objective B: Provide data and technical support to tribes related to WRAP purposes, goals and objectives for air program needs**, such as developing Tribal Implementation Plans. Additionally, provide data and technical support to EPA for any Federal Implementation Plans affecting Indian country.

**Deliverables:**

1. Provide data and technical support to tribes as needed/requested.
2. Update WRAP factsheets (at <http://www.wrapair.org/tribal/index.htm>) to create a “What WRAP can do for you” document for tribes. Include a list of WRAP technical and policy assistance documents and tools available to tribes.
3. Create and maintain web page on WRAP website that assembles WRAP and non-WRAP documents, trainings, tools, and other resources that inform and relate to WRAP purposes, goals and objectives for air program needs affecting tribes.
4. Provide email updates of WRAP projects and available technical tools, at least quarterly, to WRAP member tribes and other tribes in the WRAP region. [This item is the same as A.2.b. and may be combined with A.4.a.]
5. Schedule conference calls for WRAP members, as needed, on specific topics identified by WRAP member tribes or WRAP board member tribes.
6. Develop and hold at most two trainings for WRAP member tribes, as needed, on specific topics identified by WRAP member tribes or WRAP board member tribes.

**Objective C: Coordinate and collaborate with other tribal organizations in order to meet the air quality program needs of tribes in the WRAP region and to leverage resources.** Maximize communications and coordination within WRAP and leverage work activities with other tribal organizations whose air quality work scope includes the WRAP region, including the following:

* Alaska Native Tribal Health Consortium (ANTHC): ANTHC was formed with the mission of providing the highest quality health services in partnership with the Alaskan Native people and the Alaska Tribal Health System. ANTHC’s Environmental Health Consultation Program offers assistance to villages for both indoor and outdoor air quality projects, including healthy homes and respiratory health, monitoring, cooperative agreements for village-level air quality projects, capacity building, and education and outreach materials.
* Institute for Tribal Environmental Professionals (ITEP): ITEP was established at Northern Arizona University (NAU) in 1992, in cooperation with EPA, to support environmental protection of Native American natural resources. ITEP’s mission is to serve tribes through outstanding, culturally-relevant education and training that increase environmental capacity and strengthen sovereignty.
* National Tribal Air Association (NTAA): Since its founding in 2002, NTAA has been a leading voice for tribal air quality issues, programs, and policies. With over eighty (80) principal member tribes, the NTAA’s mission is to advance air quality management and policies and programs, consistent with the needs, interests, and unique legal status of American Indian tribes and Alaskan Natives.
* Tribal Air Monitoring Support (TAMS) Center: The TAMS Center was created in 1999 through a partnership between federally recognized tribes, NAU, ITEP, and EPA. The mission of TAMS is to “develop tribal capacity to assess, understand, and prevent environmental impacts that adversely affect health, cultural, and natural resources.”

**Deliverables:** Conduct (at least) quarterly “check-ins” with each tribal organization through either regularly scheduled meetings or special WRAP Tribal Caucus-sponsored meetings (e.g. as needed).

1. Provide WRAP updates to tribal organization representatives on latest WRAP work and its implications for WRAP region tribes.
2. Provide the opportunity to gather feedback and input from the tribal organization representatives and explore opportunities for collaboration and leveraging of resources.

Summary Budget 2014-18

$80,000 over the timeframe of the Work Plan is estimated to be needed and should be allocated to fulfill the Tribal Air Quality Capacity and Tribal Implementation Plan (TIP) Development objectives through regular meetings and calls.

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Project** | **Funding Year** | | | | | | | | | |
| 2014 | | 2015 | | 2016 | | 2017 | | 2018 | |
| Travel, Calls, Meetings $ | Staff Support (% FTE) | Travel, Calls, Meetings $ | Staff Support (% FTE) | Travel, Calls, Meetings $ | Staff Support (% FTE) | Travel, Calls, Meetings $ | Staff Support (% FTE) | Travel, Calls, Meetings $ | Staff Support (% FTE) |
| Objective A: Tribal Data Workgroup | 0 | 0.05 | $15,000 | 0.1 | $15,000 | 0.1 | $15,000 | 0.1 | $15,000 | 0.1 |
| Objectives B & C: Tech Support/Coordination | 0 | 0.05 | $5,000 | 0.1 | $5,000 | 0.1 | $5,000 | 0.1 | $5,000 | 0.1 |
| **Total** | 0 | 0.1 | $20,000 | 0.2 | $20,000 | 0.2 | $20,000 | 0.2 | $20,000 | 0.2 |

Deliverables and Timeline

1. Fulfill Objectives A.1 through A.4, above: Strengthen and support tribal involvement in the WRAP on an ongoing basis.
2. Fulfill Objectives B.1 through B.6, above: Provide data and technical support to tribes related to WRAP purposes, goals and objectives for air program needs on an ongoing basis.
3. Fulfill Objectives C.1 and C.2, above: Coordinate and collaborate with other tribal organizations in order to meet the air quality program needs of tribes in the WRAP region and to leverage resources on an ongoing basis.

1. Advise the TSC and WRAP Board on issues and developments related to Tribal Air Quality Capacity and Tribal Implementation Plan (TIP) Development.