

THE CLEAN POWER PLAN'S SUPPLEMENTAL PROPOSED RULE FOR INDIAN COUNTRY: A SNAPSHOT



NTAA is urging your Tribe to comment on EPA's proposed Clean Power Plan's Supplemental Proposed Rule for Indian Country. This supplemental proposal is part of President Obama's Climate Action Plan to curb climate change caused in large part by carbon dioxide (CO₂) emissions from large electric generating units, namely coal-fired power plants. The emission reduction goals will be accomplished using 4 main strategies, referred to as "building blocks". These building blocks include: (1) Making existing coal plants more efficient; (2) Using existing natural gas plants more effectively; (3) Increasing renewable energy use; and (4) Increasing end-use energy efficiency. The proposal has two main elements: (1) Emission rate-based CO₂ goals which are specific to each U.S. territory and area of Indian country that has affected EGUs; and (2) guidelines for the development, submission and implementation of plans to achieve the goals. The EPA is aware of three areas of Indian country with affected EGUs: Lands of the Navajo Nation in Arizona and New Mexico, lands of the Ute Tribe of the Uintah and Ouray Reservation in Utah, and lands of the Fort Mojave Tribe in Arizona. To set the proposed area-specific CO₂ emission reduction goals, the EPA generally applied the same approach to determining the "Best System of Emission Reduction" as called for in Clean Air Act section 111(d) used in the June 18, 2014, proposal for establishing CO₂ goals for states. EPA will assist Tribes with the development of implementation plans to meet CO₂ reduction goals at affected facilities (see list below) as appropriate.

This supplemental proposal addresses four electric generating units (EGUs) in Indian Country:

- South Point Energy Center, in Fort Mojave Indian country - Mohave Valley, AZ
- Navajo Generating Station, in Navajo Indian country - Page, AZ
- Four Corners Power Plant, in Navajo Indian country - Fruitland, NM
- Bonanza Power Plant, in Ute Indian country - Vernal, UT

"On October 28, 2014, EPA issued a supplemental proposal to the Clean Power Plan to address carbon pollution from affected power plants in Indian Country and U.S. territories. Like the Clean Power Plan proposal for states, this supplemental proposal sets area-specific goals for Indian country and territories and provides options for meeting those goals in a flexible manner that accommodates a diverse range of approaches. EPA is following through on its June 2014 commitment to issue a supplemental proposal to address these sources."

- EPA, Clean Power Plan website, 2014

How can we submit comments?

- NTAA will have template letters for you to use at www.ntaatribalair.org in the near future.
- The complete rule and detailed instructions on how to submit comments to EPA can be found at:
<http://www2.epa.gov/carbon-pollution-standards/clean-power-plan-supplemental-proposal>

Comment deadline is Dec. 19, 2014 — Questions can be directed to EPA's Melanie King at 919-541-2469

What will this Proposed Rule Impact?

The EPA does not expect additional emission reductions from areas of Indian country with affected EGUs beyond those already accounted for in the original Clean Power Plan and through existing pollution curtailment efforts. Consultation letters have been provided by EPA to other Tribes near each of the plants. NTAA will issue a comment letter in response to the proposed rule in the coming weeks. Please visit NTAA's Policy Response website for additional resources: <http://www4.nau.edu/itep/ntaa/resources/resources-policy-response-kits.asp>.

Affected Area	Goal using proposed approach A for building block 3		
	Interim goal 2020-2034	Final goal 2030	Method
[Adjusted output-weighted-average pounds of CO ₂ per net MWh from all affected fossil fuel-fired EGUs]			
Lands of the Fort Mojave Tribe	856	855	Reductions associated with compliance with the goals for the lands of the Fort Mojave Tribe were already accounted for in the Clean Power Plan proposal of June 18, 2014 (See: Carbon Pollution Guidelines for Existing Power Plants: Emission Guidelines for Greenhouse Gas Emissions From Existing Stationary Sources: Electric Utility Generating Units).
Lands of the Navajo Nation	1,991	1,989	EPA expects that by 2019, one EGU will shut down or generation will be curtailed at the Navajo Generating Station and starting in 2014, three EGUS's at the Four Corners Power Plant will be shut down to comply with requirements for regional haze rules.
Lands of the Ute Tribe of the Uintah and Ouray Reservation	2,000	1,988	Reductions associated with compliance with the goals for the lands of the Ute Tribe of the Uintah and Ouray Reservation were already accounted for in the Clean Power Plan proposal of June 18, 2014.

Questions? Please contact:

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To Comment on the Supplemental Proposal:

Email A-and-R-Docket@epa.gov: Include docket ID No. EPA-HQ-OAR-2013-0602 in the subject line of the message.
 Fax comments to: 202-566-9744.

Mail: Environmental Protection Agency, EPA Docket Center (EPA/DC), Mail code 28221T, Attention Docket ID No. OAR-2013-0602, 1200 Pennsylvania Avenue, NW., Washington, DC 20460.

