

Fort Belknap Indian Community

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July 2008
OPRA
Action



R.R. 1, Box 66
Fort Belknap Agency
Harlem, Montana 59526
PH: (406) 353-2205
FAX: Council - (406) 353-4541
FAX: Departments - (406) 353-2797

Fort Belknap Indian Community
(Tribal Govt.)
Fort Belknap Indian Community
(Elected to administer the affairs of the community and
to represent the Assiniboine and the Gros Ventre
Tribes of the Fort Belknap Indian Reservation)

September 16, 2008

RB-08-001-2237-OPRA

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SEP 23 2008

USEPA RA'S OFFICE

Carol Rushin
Acting Regional Administrator
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, CO 80202-1129

Re: PM_{2.5} Designation Recommendation for the Fort Belknap Indian Reservation

Dear Ms. Rushin,

The Fort Belknap Indian Community Council appreciates the opportunity to submit a designation recommendation of the National Ambient Air Quality Standard for PM_{2.5} for areas under the jurisdiction of the Fort Belknap Indian Reservation. The Fort Belknap Indian Community Council is committed to the protection of the environment and human health and safety for future generations and exercise our inherent sovereign authority over our airshed in accordance with the appropriate provisions of sections 301(d), 110(o), and the Tribal Authority Rule, consistent with section 107(d) (1) of the Clean Air Act. The Fort Belknap Indian Community Council recommends that the lands within the exterior boundaries of the reservation be designated as Unclassifiable for the annual and 24-hour standards for PM_{2.5}. Below are the reasons for the basis of our request.

Geography

The Fort Belknap Indian Reservation encompasses approximately 1,200 square miles in north central Montana within Blaine and Phillips Counties, 40 miles south of the Canadian border. The Fort Belknap Agency is located to the north on U.S. Highway #2, with the communities of Hays and Lodge Pole located 35 miles south. The northern three-fourths of the Reservation consist of broad treeless glacial plains and alluvial river valley lands. The southern one-fourth of the Reservation consists of rolling grassland, river breaks, and the Little Rocky Mountains, which reach an elevation of approximately 6,000 feet.

Population Density and Degree of Urbanization

There are approximately 3,438 enrolled tribal members living on or near the reservation, with approximately 2,200 tribal and non-tribal members residing at the Agency, which runs adjacent to US #2 and Montana Route #66. With a population 3438, the reservation population density is 3 persons per square mile. The Agency consists of approximately

340 homes, four churches, one college, one Head Start, one casino, and one gas station, Tribal/BIA administration building, IHS hospital, and 47 various government and tribal buildings. The majority of these dwellings are within ½ mile of US Hwy #2 and Montana Route #66.

Growth Rates and Patterns

According to the 2005 BIA Labor Force report, the total resident/service area Indian population increased by 24%, this is due to tribal members returning to the reservation to live. Population under age 6 increased by 38%, 16-64 years increased by 13%, and 65 years and older increased by 37%. The public sector increased by 11% and the private sector increased by 5%. The number employed below poverty line decreased 53% and the unemployment rate is at 72%.

Meteorology

The Ft. Belknap Indian Reservation is located in north central Montana, 200 miles east of the Rocky Mountain range. The climate varies from -40° in mid-winter to 100°+ during mid-summer. The prevailing wind direction blows from 280°-310°, WNW to NW. The Fort Belknap Indian Community Wind Development Plan has also recorded average wind speeds of 12 mph on the southern end of the reservation and 14.9 mph west of the Agency. Ft. Belknap Indian Reservation experiences all climatic conditions from the four seasons. Elevation varies from 2,200' in the Milk River valley to 6,000' at the peaks of the Little Rocky Mountains.

Traffic and Commuting Patterns

While the population density of the reservation is relatively low, the total mileage of paved and unpaved roads contained within the reservation is relatively high. There are two major highways that run through the Fort Belknap Indian Reservation, US Highway #2 runs through the northern part for 24 miles east-west, while Montana Route #66 intersects with US Highway #2 and runs south for 40 miles. US Highway 2 is the main thoroughfare for shipping across northern Montana. Fort Belknap Transportation Department volume counts show peak hours on US Highway #2 at 2,351 ADT and on Montana Route #66 at 2113 ADT. Thus, fugitive dust emissions from roadways are a major source of particulate emissions. Although traffic volumes are heavy and contribute to the overall deterioration of air quality, actual emissions from either highway are unknown, sufficient air quality data is needed in order to determine impacts to Fort Belknap's airshed.

Emission Data

The Fort Belknap Air Quality program, with the help of Portage Environmental, conducted two Emission Inventories for the areas within the exterior boundaries of the Fort Belknap Indian Reservation prior to this year. The first inventory focused on providing a baseline assessment of existing air pollution sources, collecting and evaluating data, identifying gaps in available information, and assessing whether additional monitoring is necessary. These results indicate that in order to accurately characterize the air quality of the areas within the Fort Belknap Indian Reservation jurisdiction, site-specific air quality monitoring is required. These results also clearly

indicate that air quality within the exterior boundaries of the Fort Belknap Indian Reservation is inconclusive.

Air Quality Data

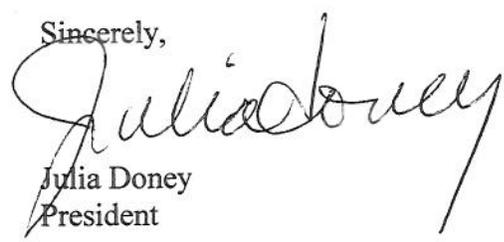
There has been a Saturation Study for PM10 done in the southern end of the reservation for one year and a PM10 and PM2.5 study done at the Agency area for one year. We believe that there was not three years worth of information collected during these studies to accurately make an assessment. Therefore, there is insufficient information to determine if the airshed within the exterior boundaries of the reservation are in non-attainment for PM2.5. The general reference for this recommendation is the Transportation Equity Act of the 21st Century (Section 6102 (c)(1) of TEA-21), which states that designations are based on sufficient monitored data obtained through the use of federal reference or equivalent monitoring methods. The nearest PM2.5 monitor, relevant to the Fort Belknap Indian Reservation, is located 160 miles southwest in Great Falls and 190 miles east on the Fort Peck Indian Reservation. It is believed that PM2.5 data from either station do not represent the Fort Belknap Indian Reservation airshed, due to the unique topography and meteorological conditions.

In conclusion, due to topographical conditions, population density, monitoring station locations, climatological conditions, and the community of the Agency with respect to the two main highways, we find these reasons make it clear that there is a gap in the data network in the vicinity of the Reservation that makes characterization of local air quality incomplete.

The Fort Belknap Indian Community respectfully recommends that the Fort Belknap Indian Reservation and the areas within its exterior boundaries be designated as *unclassifiable* for the PM2.5 National Ambient Air Quality Standard. Thank you for your immediate attention on this matter.

If you have any questions regarding this recommendation or requests for additional information, please contact Ina Nez Perce (Environmental Manager) at 406-353-8429.

Sincerely,



Julia Doney
President

Cc: Loren Stiffarm, CAO
Ina Nez Perce, Env. Dept. Mgr.
Darrel Harmon, Tribal Program Manager, USEPA
Kermit Snow Jr., Air Quality Specialist
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