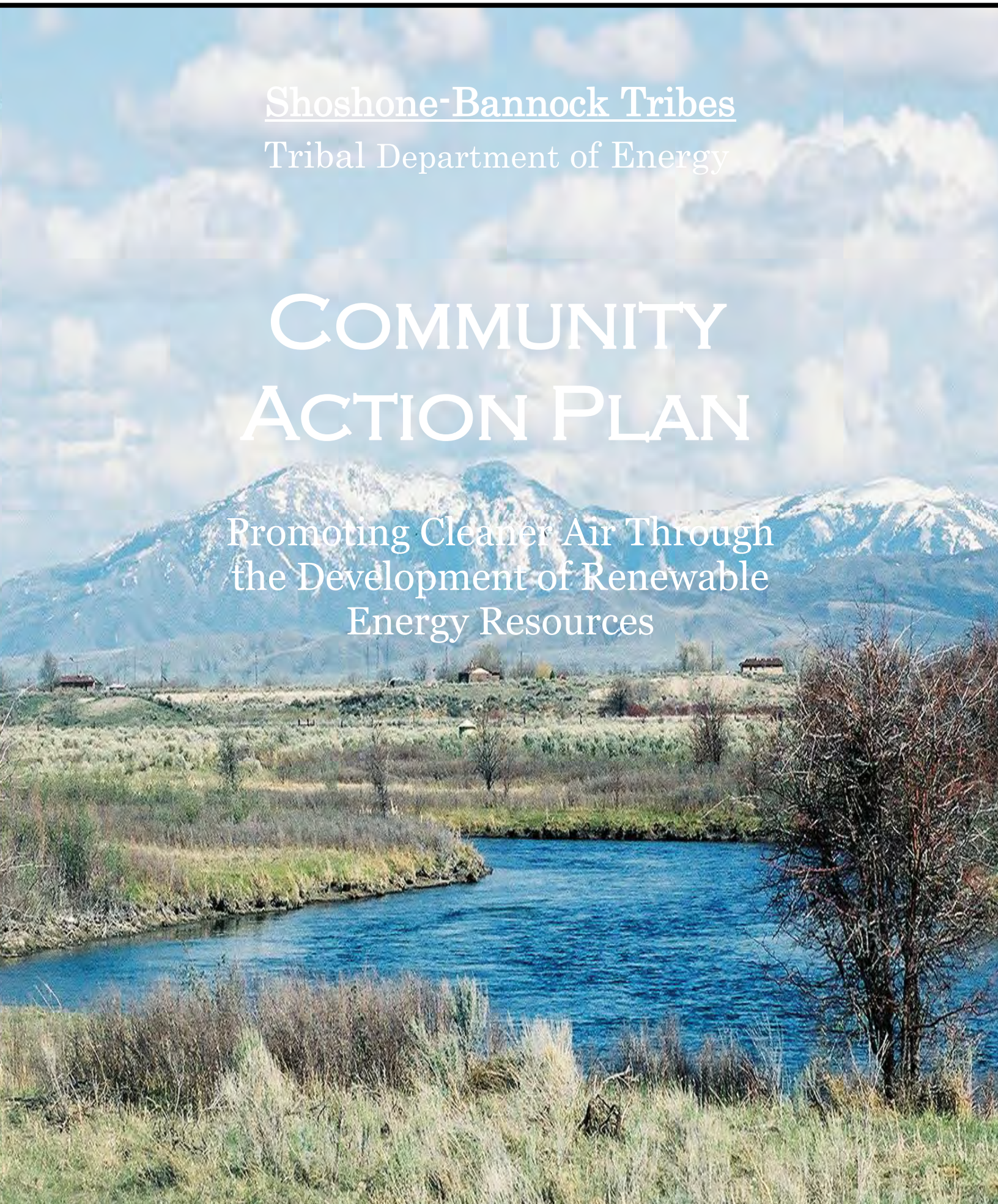

Shoshone-Bannock Tribes

Tribal Department of Energy

Community Action Plan

Promoting Cleaner Air Through the Development of Renewable Energy Resources

November 15, 2022

Dear Residents of the Fort Hall Reservation:

The Shoshone-Bannock Energy Resources program is excited to provide this community action plan as a collaborative living document to guide the Energy Resources Program's mission to develop and implement renewable energy technology and energy efficiency projects for the benefit of the economy, environment, culture and the health and safety of the Fort Hall community.

The Tribal Energy Resources Program works diligently to assess, develop, and promote renewable energy and energy efficiency projects for the benefit of the economic, natural, and cultural resources and health and safety for the community. Greenhouse gas is released from agricultural, residential, and business sources and is detrimental to the long-term sustainability of our people.

Under this project, greenhouse gas (GHG) emission data are being collected from Tribal lands. These data will then be analyzed and used for public education and outreach on GHGs and impact to climate change and awareness of technological advances in renewable energy as an alternative to carbon emitting sources.

We appreciate the community input to this plan and sincerely hope that the work under this project results in beneficial tribal policies for our people.

Sincerely,

Alana Baldwin
Energy Resource Coordinator - Tribal Energy Resources Program

test

Acknowledgements

The Shoshone-Bannock Tribal Energy Program greatly appreciate the financial assistance provided by the United States Environmental Protection Agency's Office of Environmental Justice under the 2020 Environmental Justice Collaborative Problem-Solving (EJCPS) Cooperative Agreement Program Award.

The Tribal Energy Program would also like to thank the Fort Hall district community for providing valuable input to this Community Action Plan.

Finally, the Tribal Energy Program would like to express support for all project partners to this effort.

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Executive Summary

The Shoshone-Bannock Tribes has a traditional, core value for environmental protection and the protection of human health and natural resources on the Fort Hall Reservation. The Tribal Energy Resources Program works diligently to assess, develop, and promote renewable energy and energy efficiency projects for the benefit of the economic, natural, and cultural resources and health and safety for the community.

Greenhouse gas (GHG) is released from agricultural, residential, and business sources and is detrimental to the long-term sustainability of our people. In recent studies, researchers have determined adverse conditions can be attributed to the surrounding sources of agricultural practices, electricity sources generating carbon dioxide, and general car emission. These conditions lead to severe allergies and respiratory disorders, lung tissue damage, and asthma. This can result in causing an increase of doctor visits, missed school and work. Fort Hall also experiences higher impacts from ozone than on average in the State of Idaho, resulting in an increased exposure to carcinogenic toxins in the air.

The Energy Resources and Air Quality Departments are initiating a two-year greenhouse gas monitoring project as part of an education and outreach to implement renewable energies with the AQS1 Urban Air Monitor. Under this project, greenhouse gas emission data are being collected from Tribal lands. These data will then be analyzed and used for public education and outreach on GHGs and impact to climate change and awareness of technological advances in renewable energy as an alternative to carbon emitting sources.

Ultimately, the goals of the Energy Resources and Air Quality Departments is to garner support through the data to implement renewable energies on the Reservation to combat climate change and adverse conditions.

The Tribes have the opportunity to meet the challenge of climate change by adopting and implementing this Community Action Plan. Once backed by the community, the Fort Hall Business Council can directly effect change through policy or program decisions and therefore promote regional energy conservation and clean energy production.

Background and Purpose

Greenhouse gas is released from agricultural, residential, and business sources and is detrimental to the long-term sustainability of our people. In fact, Idaho is already being impacted by climate change. Over the past century, most of the state has warmed one to two degrees °F (see Figure 1 below).

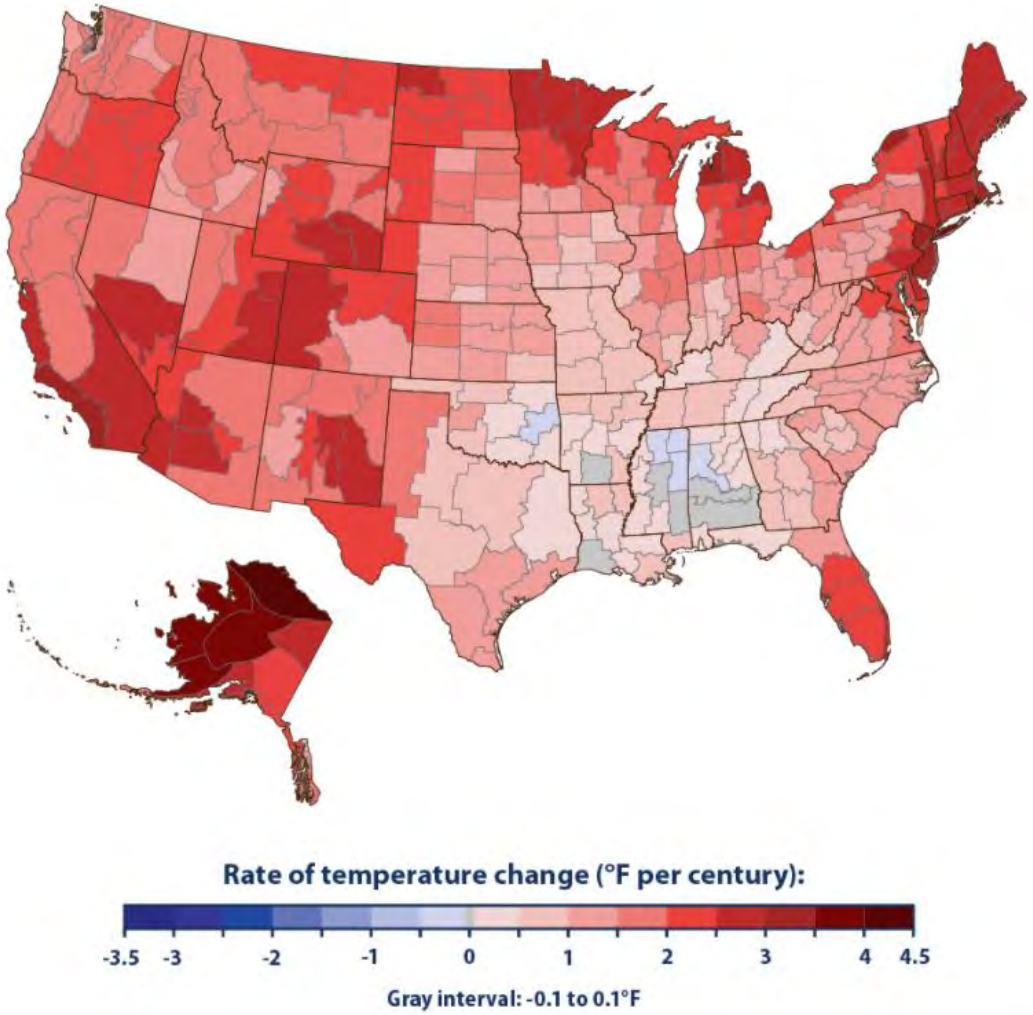


Figure 1: Average Temperature Change in the United States from 1901 to 2020. Source: EPA, Climate Change Indicators in the United States.

While these steadily rising temperatures and their resulting impacts are definitely problematic, an additional risk from climate change is the increased variability of temperature and precipitation trends including increased extreme weather events. For example, an area may have similar annual precipitation amounts but could get more rainfall in the spring and

less in the summer. Too much water in the spring may cause flooding and less in the summer could result in less useful water for irrigation.

Snowpack is melting earlier in the year, and the flow of meltwater into streams during summer is declining. In the coming decades, streams will be warmer, populations of several fish species may decline, wildfires may be more common, deserts may expand, and water may be less available for irrigation (EPA, 2016).

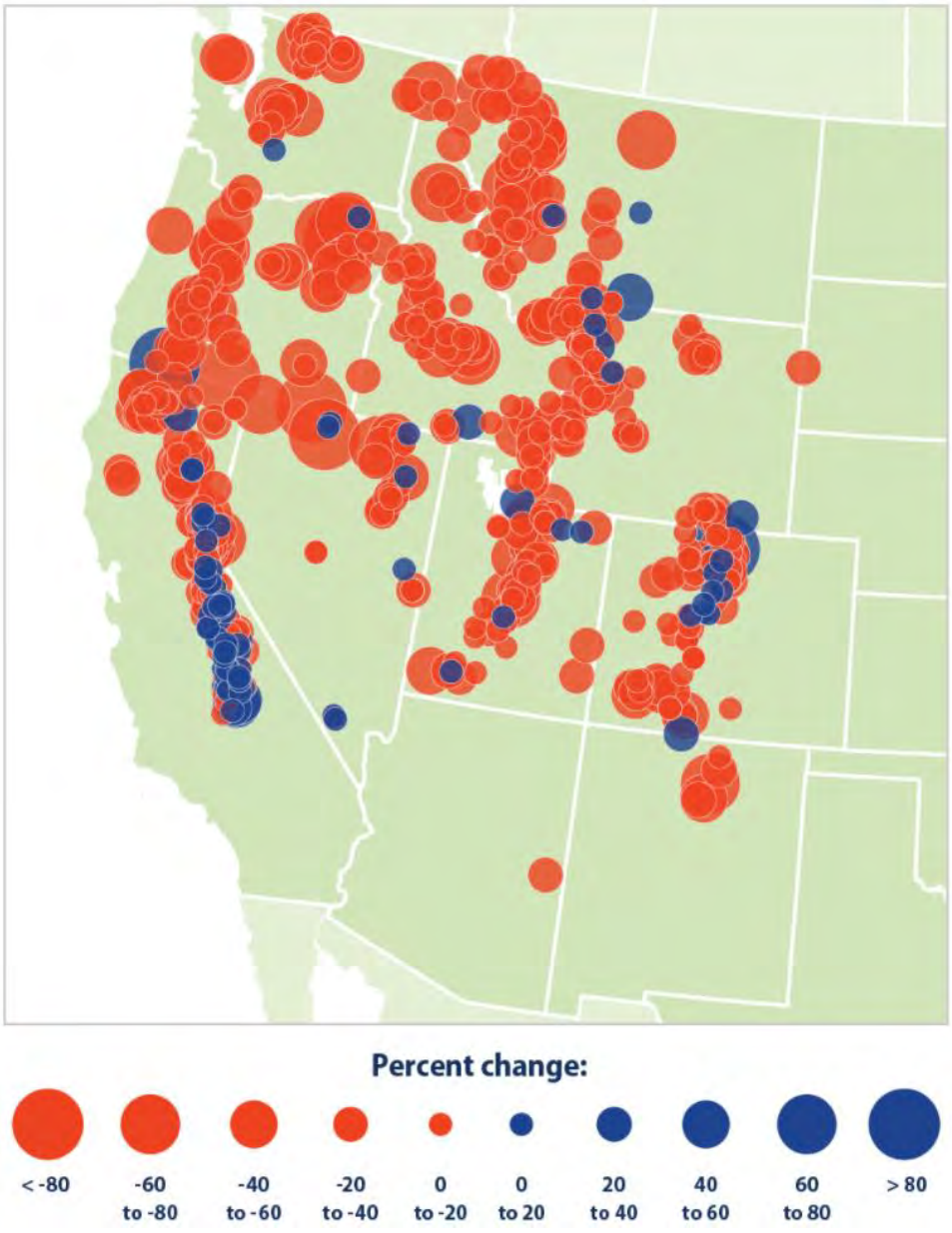


Figure 2: Trends in April Snowpack in the Western United States, 1955-2020. Source: EPA Climate Change Indicators

Declining snowpack and streamflow could adversely impact regional recreation economies and aquatic ecosystems. Water temperatures will rise if there is less melting snow to feed the streams during summer. The combination of warmer water and lower flows would threaten salmon, steelhead, trout, and other cold-water fish. Hydroelectric power production will also likely be impacted by lower flows (EPA, 2016).

Climate change may also increase the number and severity of forest or grassland fires. On average, nearly 1 percent of the land in Idaho has burned per year since 1984, making it the most heavily burned state in the nation (EPA, 2016). Increasing wildfires also threaten homes and pollute the air.

Figure 3: Image of the 2018 Chesterfield Fire near Fort Hall, ID

There are also secondary effects of climate change on vegetation. For example, increased temperatures and reduced water can make trees more susceptible to pests and disease, and trees damaged or killed burn more readily than living trees. This could increase the area of pine forests in the Idaho infested with mountain pine beetles over the next few decades.

The combination of more fires and drier conditions may expand deserts and otherwise change the landscape in southern Idaho. Many plants and animals living in arid lands are already near the limits of what they can tolerate. Higher temperatures and a drier climate would generally extend the

geographic range of the Great Basin Desert. In some cases, native vegetation may persist and delay or prevent expansion of the desert. In other cases, fires or livestock grazing may accelerate the conversion of grassland to desert in response to changing climate. For similar reasons, some forests may change to desert or grassland (EPA, 2016).

Finally, climate change is likely to cause additional heath threats to vulnerable populations in Idaho, including children, the elderly, the sick, and the poor.

Under this project, greenhouse gas (GHG) emission data are being collected from Tribal lands. The data will then be analyzed and used for public education and outreach on GHGs and impact to climate change and awareness of technological advances in renewable energy as an alternative to carbon emissions.

Figure 4: Image in 1996 Simplot Facility near Fort Hall, ID

Regional Air Quality and Greenhouse Gas Emissions

Gases that trap heat in the atmosphere are called greenhouse gases. Some greenhouse gases such as carbon dioxide occur naturally and are emitted to

the atmosphere both through natural processes and human activities. Other greenhouse gases (such as fluorinated gases) are created and emitted solely through human activities. The following principal greenhouse gases enter the atmosphere because of human and agricultural activities:

- Carbon dioxide
- Methane
- Nitrous oxide
- Fluorinated gases

In recent studies, researchers have determined adverse conditions can be attributed to the surrounding sources of agricultural practices, electricity sources generating carbon dioxide, and general car emissions. The Fort Hall Tribal Business Campus (TBC) is surrounded with agricultural fields harvesting wheat, grain, sugar beets, corn, potatoes, alfalfa, and cattle feed hay. Through these practices, pesticides are dispersed into the air causing severe allergies and respiratory disorders, lung tissue damage, and asthma. This can result in causing an increase of doctor visits, missed school and work. Fort Hall also experiences higher impacts from ozone 44.2 ppb/year of parts per billion (ppb) than the state value 39.9 ppb/year, one that may be attributed to both tourism and agricultural activities. Importantly, the EJSCREEN Tool shows that at the TBC (Block group: 1611940002) the PM2.5, Ozone, Air Toxics Cancer Risk, and National Air Toxins Assessment (NATA) Respiratory Hazard Environmental Justice (EJ) Indexes are at or above the 90th percentile for both the state and EPA Region.

The following sources were identified to contributing to the air quality conditions within this area: A concentrated animal feeding operation (CAFO), as defined by the United States Department of Agriculture (USDA) contributes to the reduction of ambient air quality. CAFOs is the source for various gas emissions, including ammonia, hydrogen sulfide, methane, and particulate matter. The amount of gas emissions depends largely on the size of the CAFO. The primary cause of gas emissions from CAFOs is the decomposition of animal manure being stored in large quantities.

Figure 5: Bannock Creek Cattle Company on Fort Hall Reservation

Another source we have identified contributing to GHG's are Motor Vehicles in Transportation Services and Industrial Size high emission vehicles. The High Traffic through the Campus and extended community suspending dust into the air from unpaved roads, vehicles left to idle while unattended, and Interstate 15, a major freeway, and highway 91 exit directly through the Fort Hall Reservation causing high emission rates to impact the community. Lastly, our tribal campus is mostly powered by electricity and most mechanisms for generating electricity release carbon dioxide and other greenhouse gases—gases that absorb and emit radiation -- into Earth's atmosphere. While small quantities of carbon dioxide exist naturally in the atmosphere, the generation of electricity has greatly increased the presence of greenhouse gases in the planet's atmosphere. Earth's atmosphere traps these gases, leading to air pollution and smog. Weather patterns and geological variations can affect the prevalence of smog in a particular area. The Tribal Campus is located in a valley where pollution becomes trapped causing inversions mostly during the winter months.

Figure 6: old FMC facility near Fort Hall, ID

The Fort Hall District also contains the highest population of concentrated residents and business on the Fort Hall reservation. This is due to the casino, hotel, and the Tribal businesses located within a 5-mile radius. The EJSCREEN Tool shows a Demographic Index of 80% in the Fort Hall District (Block group: 1611940002) which is at the 99th percentile for the state and EPA Region.

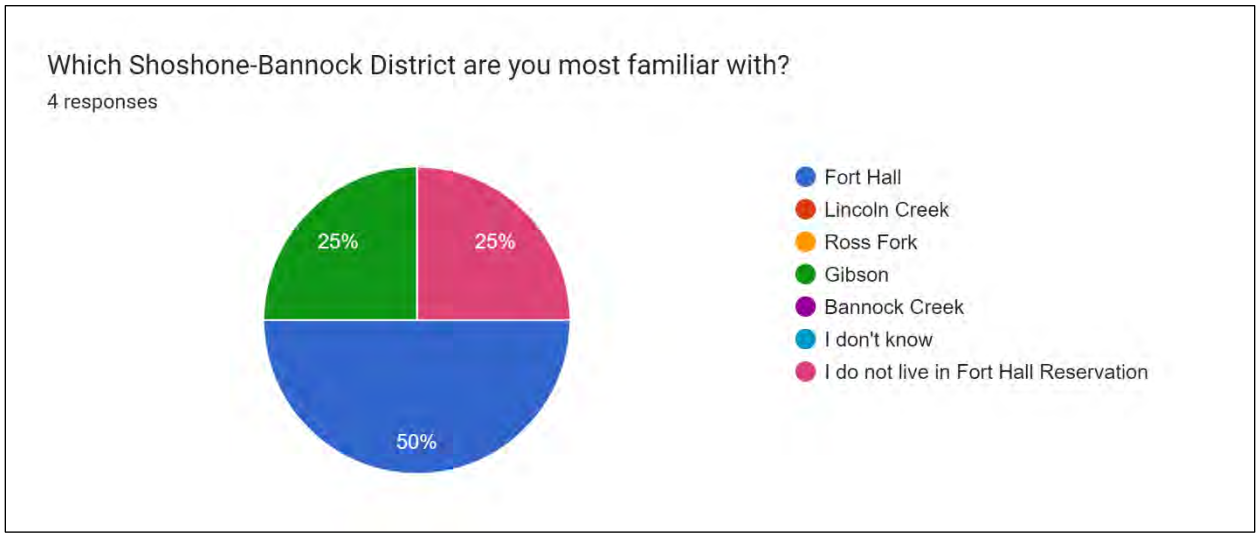
The Tribal Energy Resources program and Air Quality have a long-standing collaboration working together on monitoring activities from radiological, and chemical contaminants that impact the watershed, airshed, and viewshed of the Shoshone-Bannocks Tribal and ancestral lands. The programs work directly with the Tribal leadership, technical programs and community to ensure their social and cultural concerns are provided to the federal agencies and contractors. The program provides public updates, site visits and tours for the community to be involved in activities to protect and preserve natural and cultural resources. Air Quality program manages the Tribes air permits, and regularly reviews and comments on notices, and all material provided to the public that can impact the Fort Hall community airsheds. The following demonstrates their history and willingness to assist the community:

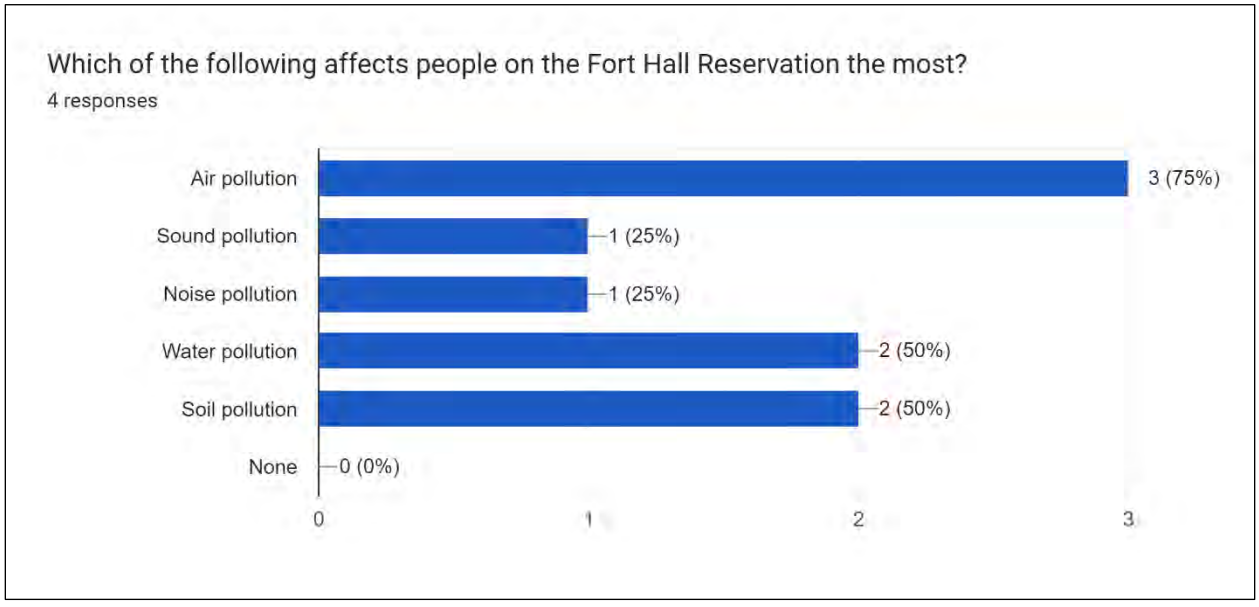
- Monitoring areas that impact the Tribal lands – Eastern Michaud Flats (EMF) sites, and air monitoring stations (daily maintenance by air quality staff).

- Monitoring of Idaho National Laboratories and DOE activities – cultural committee, elders, Tribal council and youth visits to view: Middle Butte Cave, Aviator Cave, former pioneer settlements, and prayer gatherings on the federal reserve site. Staff monitors environmental concerns of the site such as air and water quality.
- Air Quality Permit Program – Tribal air quality ordinance to monitor and protect the sources impacting air quality on the reservation.

Air Quality Community Survey Results

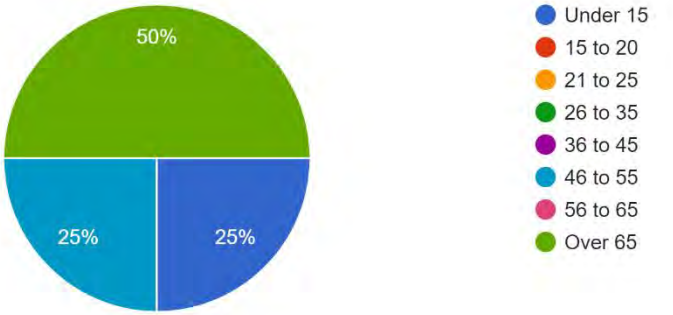
The Shoshone-Bannock Tribal Air Quality Program developed a public survey to better understand the public perception regarding air quality on the Reservation. The following provides the survey questions and a summary of responses. This survey was conducted through zoom, Tribal social media, and local newspaper due to the impact of Covid-19





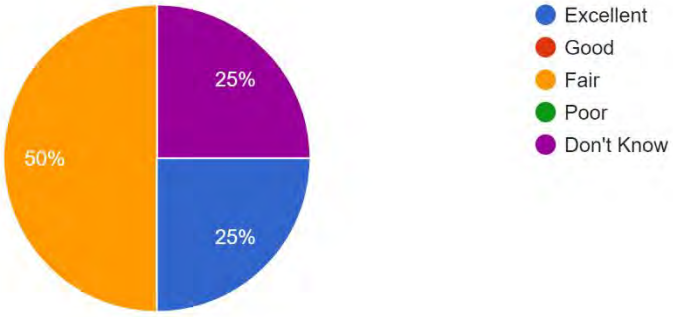
Which age group is most affected by pollution?

4 responses



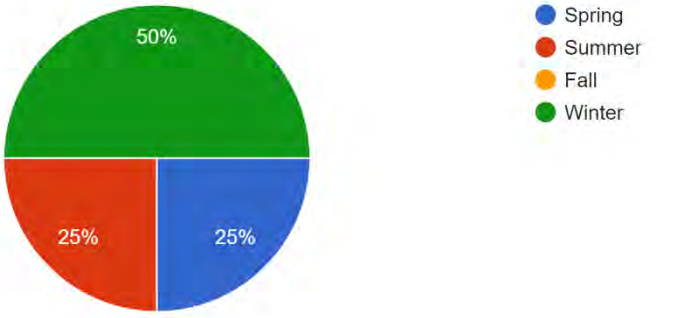
Overall how is outdoor air quality?

4 responses



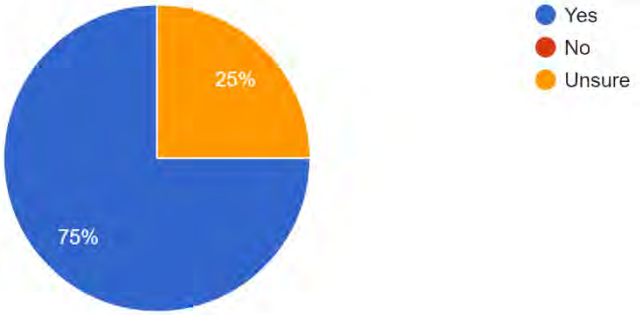
Is there a time of year that the air quality changes?

4 responses



Does air quality has a bad effect on the community?

4 responses



If yes, what are the effects?

3 responses

Allergies, asthma, other breathing conditions eye irritations

Health issues that effect our people and can keep them from many activities including work and community service.

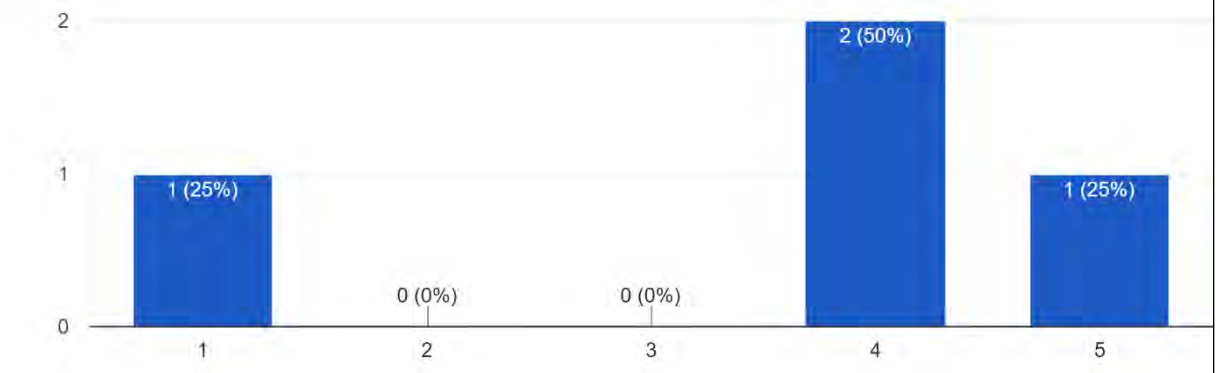
a

Does air quality cause any of these impacts on community health? (Check all that apply)

4 responses

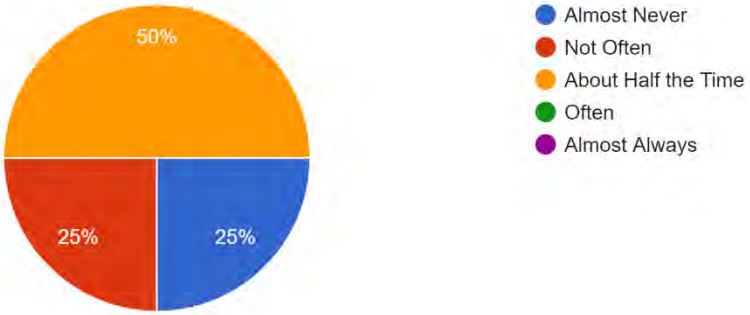
How interested is the community in learning more about actions that help improve air quality?

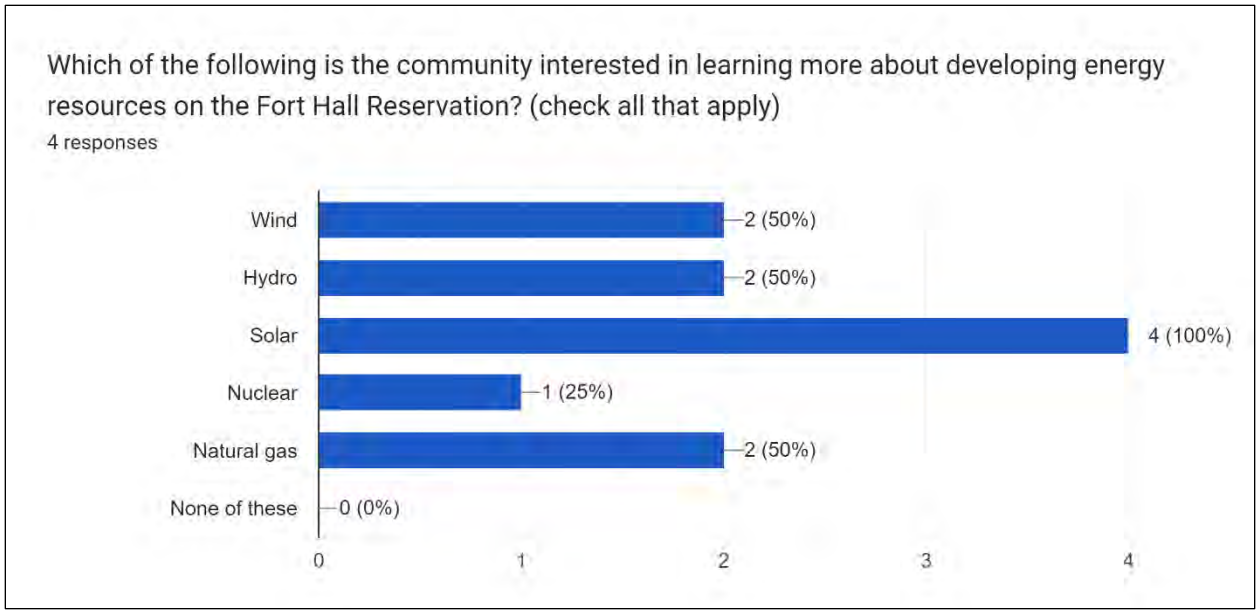
4 responses



When people get together to solve environmental pollution problems, how often do they succeed?

4 responses





There were several interesting findings from the community survey. First, air pollution was perceived to be of highest concern when compared with soil, water, noise, or sound pollution. Secondly, elders were perceived to have the highest impact from air pollution. Also, winter was found to be the season where the air quality changed the most and poor air quality was perceived to have a detrimental impact on community. Finally, when comparing alternative renewable resources, the community was most interested in developing solar energy on the Reservation.

Shoshone-Bannock Air Quality Monitoring

Shoshone Bannock Tribal Air Quality Program has been conducting sample analysis for Green House Gases (GHG) for a period of 12 months to determine the levels of carbon derivatives and other gases contributing to climate change originating from the Fort Hall District (10-mile radius). The Air Quality Monitor 65 (AQS-1), is continuously measuring common air pollutants including; ozone (O3), nitrogen dioxide (NO2), particulate matter (PM2.5), Volatile Organic Compounds (VOC).

Additionally, noise and meteorological parameters such as rainfall, temperature, humidity, pressure, wind speed and direction are being measured. AQS-1 ensures air quality data is reliable and robust and traceable back to recognized international standards e.g. USEPA (40 CFR Part 53) and EU (2008/50/EC).

Figure 7: AQS1 air monitor located in Fort Hall, ID

Figure 8: Wind sensor for the AQS1

Figure 9: AQS1 air monitor set up

The Air Quality Program has developed a web-based map application to view

real-time data associated with the AQS-1 and Purple Air monitoring locations. Clicking on the map icons provides summary data and air quality risk levels.

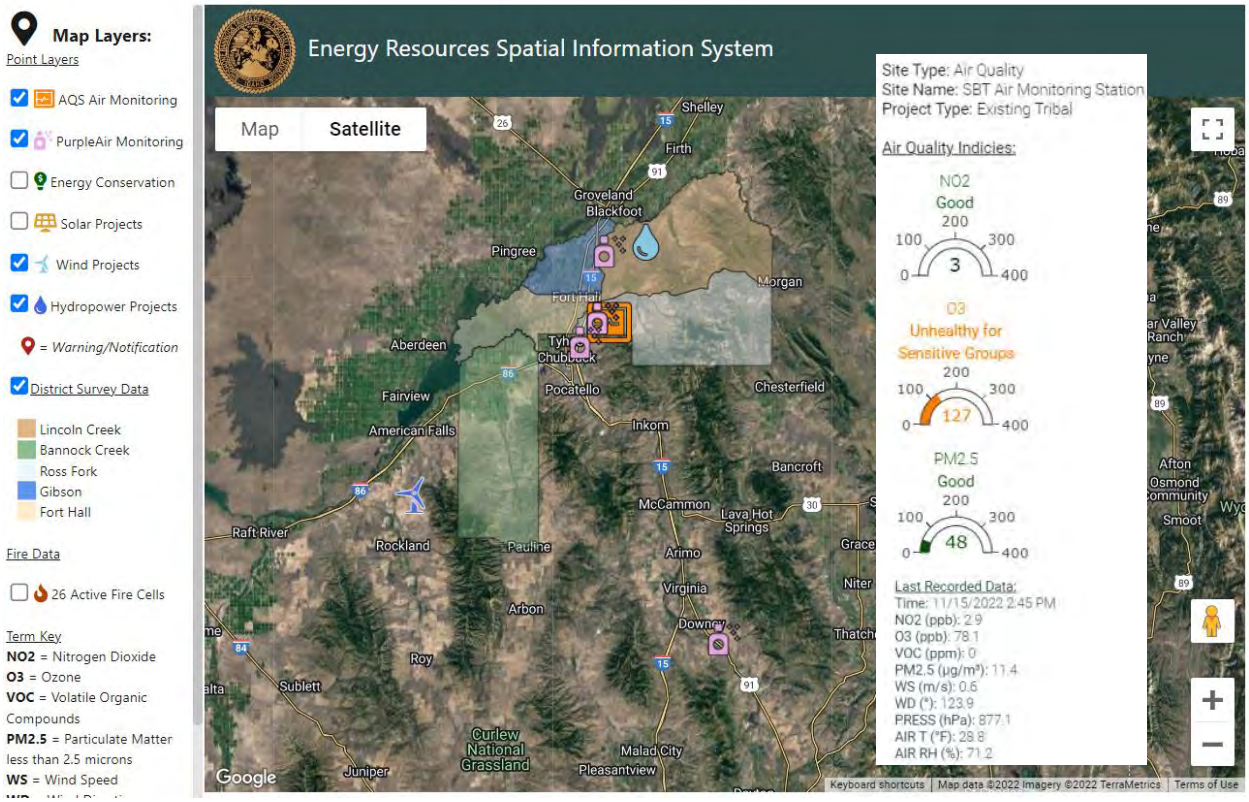
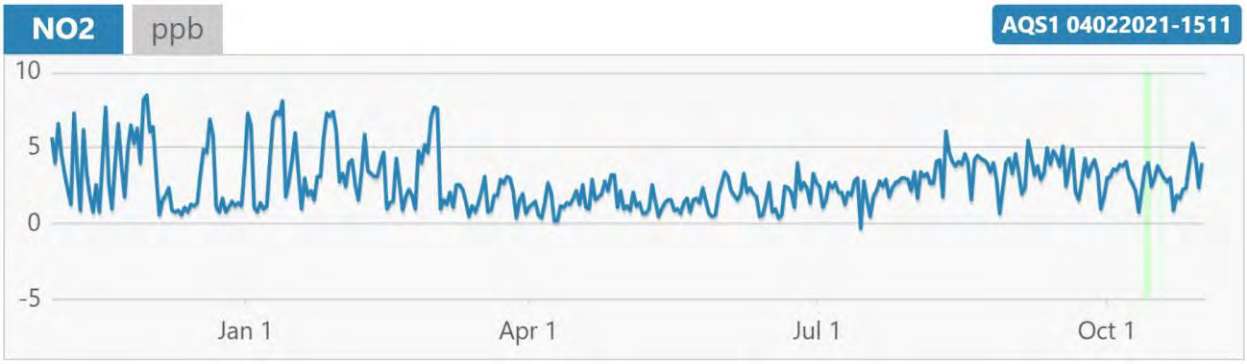


Figure 10: Image of website set up for community to observe air monitor

In addition to establishing real time data visualization, the Air Quality Program has begun analyzing the data collected over the past 12 months. The following series of plots show daily levels of Nitrogen Dioxide (NO2), Ozone (O3), Volatile Organic Compounds (VOC), Particulate Matter (PM2.5), Wind Speed (WS), Wind Direction (WD), Air Pressure, Air Temperature, and Relative Humidity over the past year (November 1, 2021 to October 31, 2022).


NO2
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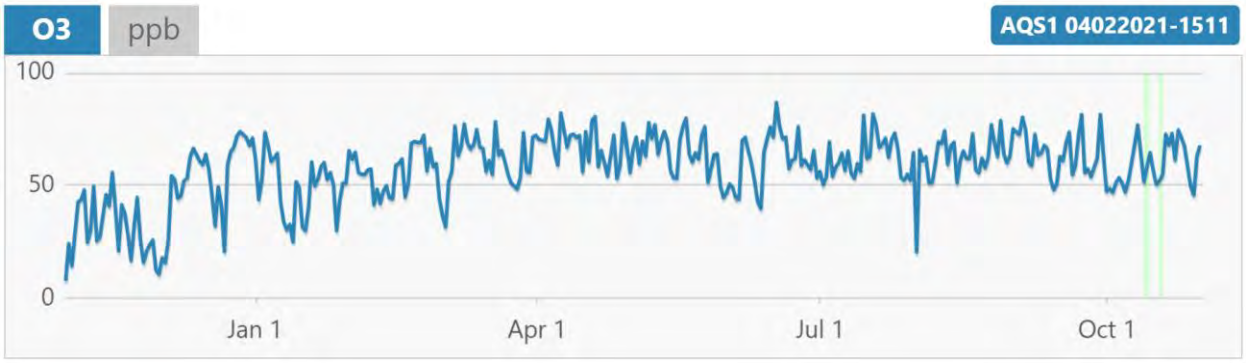
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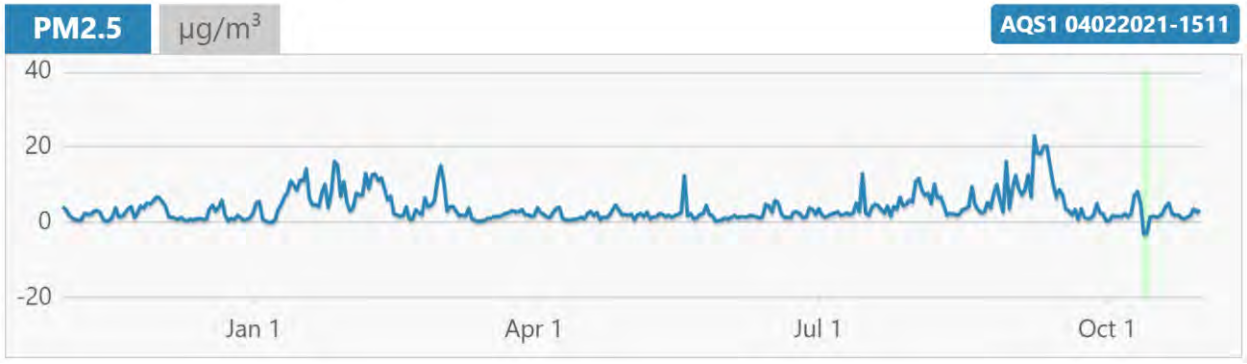
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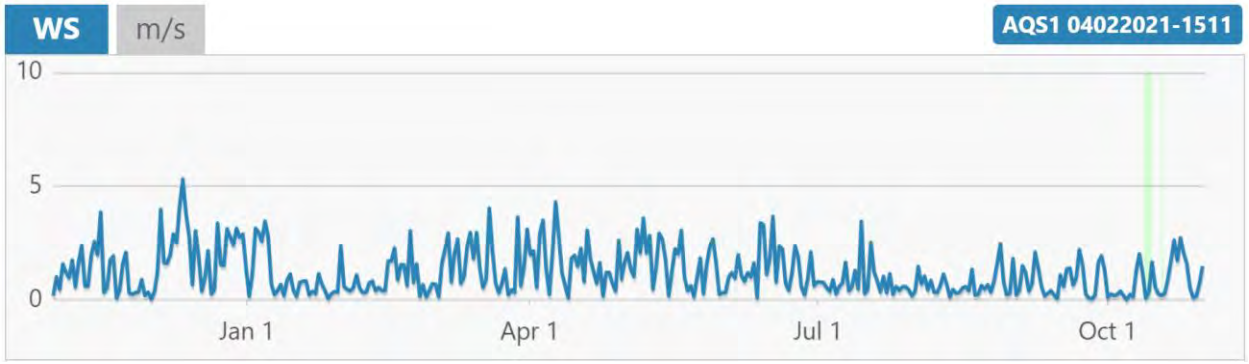
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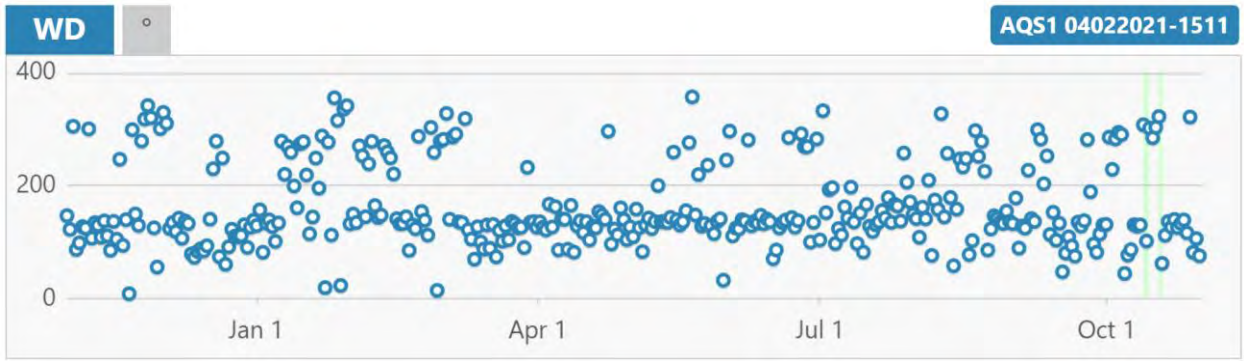
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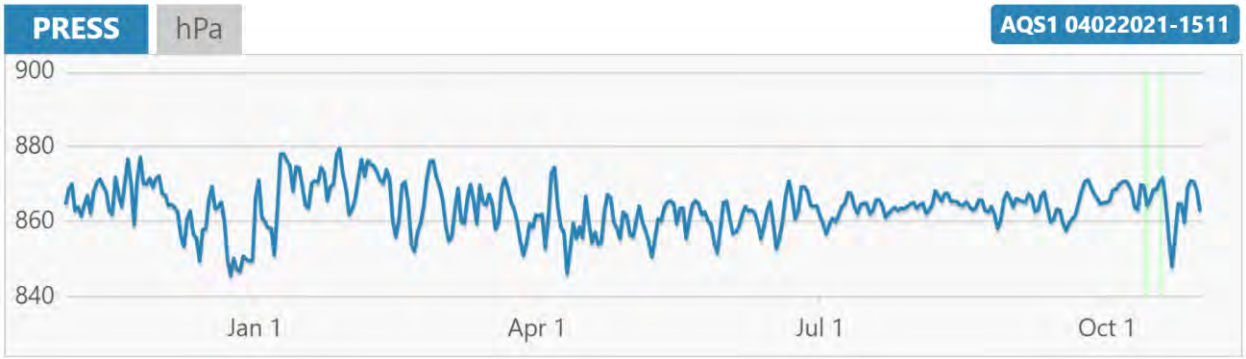
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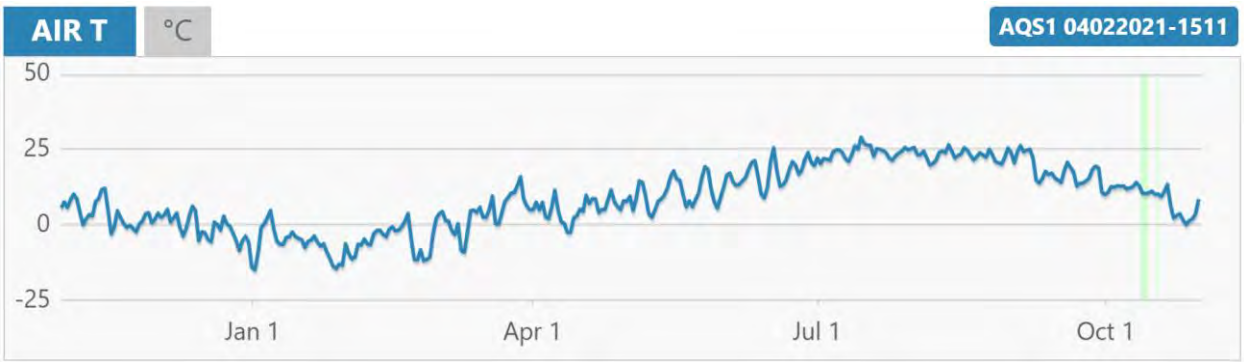
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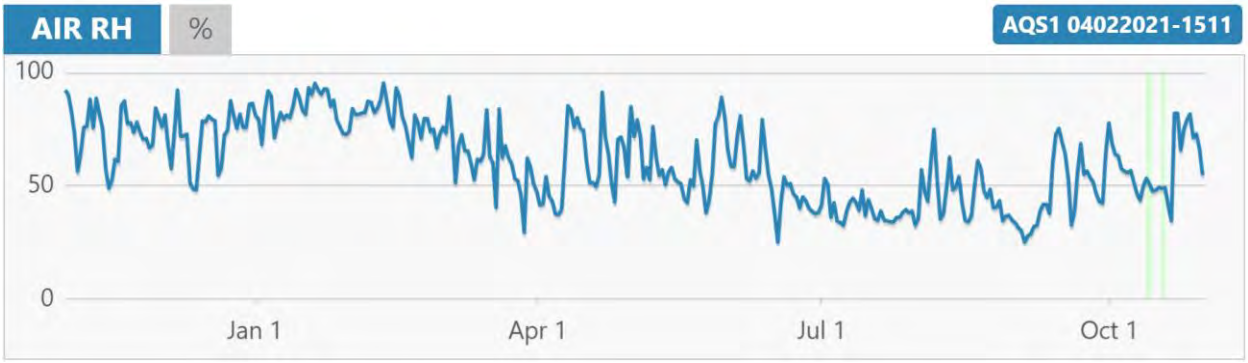
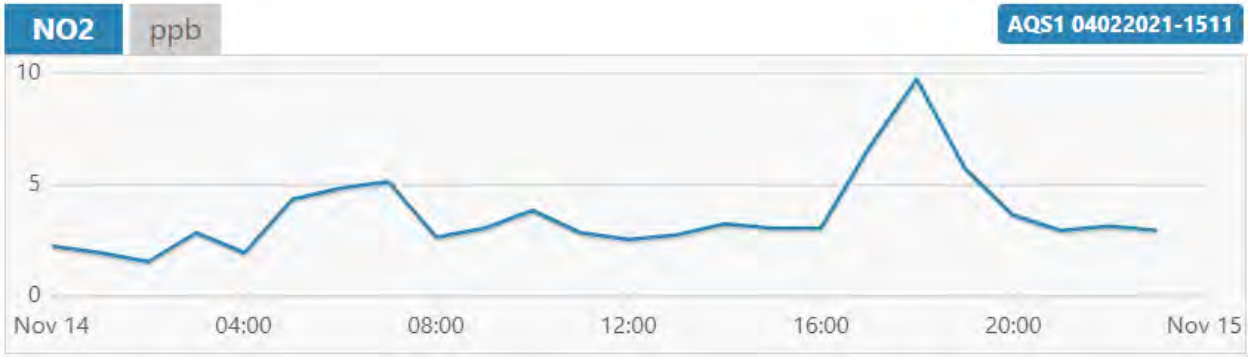
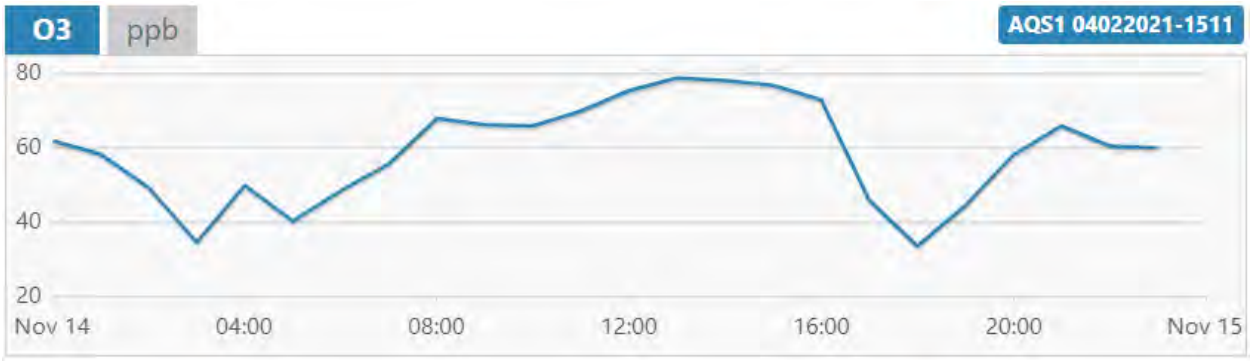


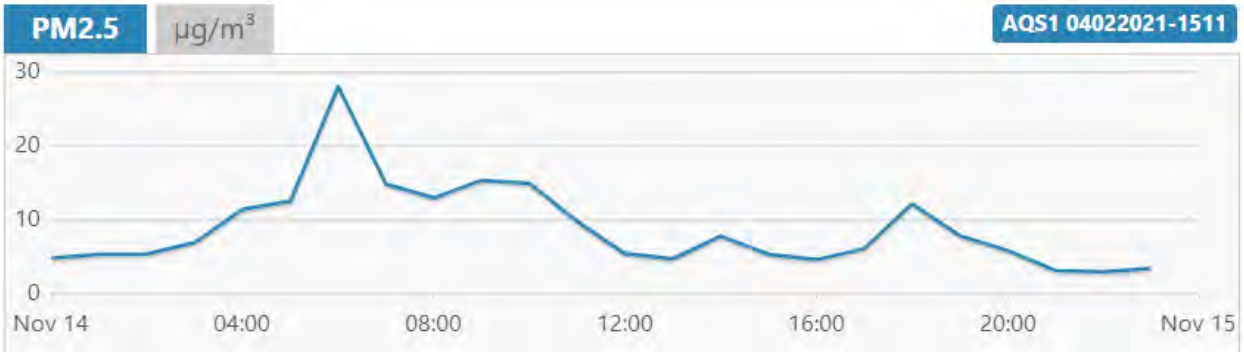
The first clear observation is how variable pollutant levels are throughout the year. Other than with VOCs (whose sensor was defective throughout the year, air pollutant levels can vary greatly depending on wind speed and direction, time of day, and human activities such as farming or road traffic.

Nitrogen Dioxide (NO2) was found to be highest in the winter while Particulate Matter (PM2.5) spiked highest in the fall (likely due to harvest operations). Ozone (O3) showed a high amount a variability but a consistent average value of about 60 parts per billion (ppb) throughout most of the year

Pollutant concentrations varied greatly even throughout the day. The following plots show hourly Nitrogen Dioxide (NO2), Ozone (O3), Particulate Matter (PM2.5), and Wind Direction (WD) on November 14, 2022.







The Air Quality Program will continue to analyze the data gathered through ongoing air quality monitoring to look for trends impacting tribal members and renewable energy development.

Mitigation Measures

Mitigations measures to combat greenhouse gas emissions but look at both energy conservation and production. IDEQ (2021) provides several potential mitigation measures to combat the impacts from greenhouse gas emissions and adverse air quality.

Energy Conservation Mitigation Measures

Optimize Lighting Energy Consumption

- Turn off lights when not in use or install occupancy sensors in hallways, bathrooms, meeting rooms, kitchens, storage rooms, and other areas where lights can be shut off for blocks of time.
- Install photocells in outdoor entryways and security lighting to automatically sense outdoor lighting levels.
- Install light-emitting diode (LED) exit signs in place of incandescent signs. LED signs last up to 15 times longer, and use less energy.
- Reduce overhead lighting near day lit areas, over lit areas, or areas not requiring light
- Install LED light bulbs
- Turn all lights off when they are not needed.

Optimize Water Energy Consumption

- Install low flow fixtures on showers, sinks, and toilets.
- Insulate hot water heaters.
- Lower the temperature on water heaters.
- Implement a water conservation program and post water conservation stickers, signs, and posters in bathrooms, kitchens, cafeterias, conference rooms, and other places where people congregate.
- Minimize lawns. Lawns use more water than any other landscape plants.
- Use drip and other low-flow irrigation devices.

Optimize Vehicle Energy Consumption

- Implement a no-idling for vehicles.
- Implement a vehicle maintenance policy for vehicle fleets to maximize vehicle efficiency.
- Consider allowing employees to telecommute or work an alternative schedule to limit driving to work.
- Educate drivers to be more efficient on the road and drive fewer miles. Speeding and rapid acceleration and deceleration can increase fuel consumption.
- Schedule travel so that multiple tasks can be accomplished with one trip.
- Remove excess weight from vehicles.
- Replace air filters regularly. A clogged air filter can significantly reduce fuel economy.
- Keep tires properly inflated. Maintaining correct tire pressure and a tuned engine can save over a ton of greenhouse gases per year.
- Change the oil according to the manufacturer's recommendations.
- Consider using biofuels, which is biomass converted directly into liquid fuel, to help meet transportation fuel needs. Ethanol and biodiesel are the two most common types of biofuels. Invest in alternative fuel and flex-fuel vehicles for your business transportation needs.
- Purchase fuel efficient or electric vehicles

Promote Alternative Transportation

- Effective public transportation systems can significantly reduce greenhouse gas emissions and air pollution while at the same time reducing congestion.
- By creating pedestrian- and biker-friendly travel routes, cities and towns can often decrease the number of vehicles on the road, leading to less congestion, air pollution, and greenhouse gas emissions.

Optimize Residential and Commercial Heating and Cooling Energy Usage

- Adjust air conditioning in the summer and heat in the winter.
- Install automatic, programmable, set-back thermostats to control heating and cooling.
- Set thermostats and lights to correspond with shifts.
- Open blinds in the winter and close them in the summer.
- Restrict the use of space heaters, consider heating pads or blankets instead.
- Clean all filters in your heating and cooling system monthly.
- Limit open doors when picking up or delivering material.
- Schedule heating, ventilation, and air conditioning system tune-ups once or twice a year. Clean coils, check and correct refrigerant charge, clean and lubricate the fan motor, check for proper airflow, adjust the pulley settings and fan belts, replace air handling unit filters, and do routine checks to ensure proper performance.
- When the building is unoccupied, ensure outside air dampers are closed, including morning warm-up periods.
- Seal ducts that run through unconditioned spaces. Leaking ductwork can lose 20% or more of the conditioned air in a supply duct run.
- When scheduling group activities and meetings after hours, use rooms and areas that can be heated and cooled individually, so the whole floor is not heated or cooled.

Optimize Purchasing for Reduced Energy Usage

- When buying new equipment, appliances, or fixtures look for ENERGY STAR or Water Sense certified.
- Purchase products with recycled content or that are recyclable.
- Purchase only what is needed, bulk is not necessarily better if it has an expiration date.

- Purchase Forest Stewardship Council certified paper and wood products.
- Purchase local and/or organic food.

Optimize Waste Management for Reduce Energy Usage

- Start a recycling program.
- Start an on-site compost pile.

Optimize Office and Personal Equipment and Electronic Energy Usage

- Install motion sensors on vending machines and remove or minimize light bulb use.
- Power down machines when not in use.
- Turn off air compressors when not in use.
- Turn computers and other equipment off at night.
- Use surge protectors for plug in devices and turn them off at the end of the day. Even when electronics or machines are not on they still consume energy. Surge protectors can eliminate the power consumed when turned off.
- Limit printing and print double sided.
- Engage energy saving features on equipment and electronics.
- Check and regularly clean filters if you use exhaust fans.
- Practice routine maintenance.
- Regularly clean and maintain food refrigeration equipment where applicable.
- Stage turn-on of continuous motor loads with one-half hour intervals between loads. This prevents spikes in demand use and associated charges due to higher-than normal start-up power.

Employee Involvement

- Start a green team.

- Seek employee suggestions on ideas for reducing greenhouse gas emissions.

Optimize Tribal Community Energy Usage

- Conduct an energy audits.
- Re-insulate the roof, walls, and foundation.
- Seal cracks and leaks to prevent air flow loss with caulk, spray foam, or weather stripping.
- Install double pane windows.
- Create a separation between entrance areas and high traffic areas to reduce heat or cool air loss.
- Install sky lights or enhance day lighting.
- Install highly reflective roofs to reduce air-conditioning loads and save money. Highly reflective roofs and surfaces can reduce air-conditioning bills by 10% to 50%.
- If conducting renovation, designing a new building, or looking for a new space to lease consider LEED criteria.
- Highly reflective roofs help make cities cooler, reduce the formation of smog, reduce air-conditioning loads, and save money. Highly reflective roofs and surfaces can reduce air-conditioning bills by 10% to 50%.
- Install a tankless hot water system.
- Plant a xeriscape garden or a garden that requires no or limited irrigation.
- Reuse wastewater or reclaimed water for other industrial uses, landscape irrigation, agricultural irrigation, aesthetic uses such as fountains, and fire protection, and other non-potable uses.
- Recycle water for the same application for which it was originally used.
- Collect rainwater or irrigation runoff for reuse (water harvesting).

- Plan routes to maximize efficiency and prevent duplication for delivery or pick up services.
- During occupied hours, ensure the amount of outside air matches load. Adding carbon dioxide monitors, coupled with outside air controls, will only allow as much outside air as is necessary to enter the building in the heating season.

Clean Energy Production Mitigation Measures

Selection of Renewable Energy Providers

- Switch the type of energy used—consider renewable energy or electricity supplied from energy sources, such as wind, solar, geothermal, hydro, and biomass.
- Purchase green power from your utility.
- Increase on-site renewable energy generation by installing solar panels or wind turbines.

Implement Offset Projects

- An offset is a reduction of greenhouse gases from the atmosphere due to a project intended to compensate for emissions occurring elsewhere. Carbon offset project types include (1) renewable energy, (2) energy efficiency, (3) land use/land change, such as reforestation and avoided deforestation, and (4) landfill gas destruction and agricultural methane destruction.
- The offset is additional, meaning the project associated with the offset would not have been completed otherwise or under a business-as-usual scenario.
- The project associated with the offset is completed in a reasonable time frame and has not yet been completed.
- Projects should produce permanent reductions.
- A local project is preferable to a long-distance project.
- Offset projects are monitored and verified.

- Offsets are not resold and are retired after purchased.
- Projects have benefits to the environment as well as health and the community.
- Specific projects with a beginning and ending are better than long-term programs.

Implementation

This community action plan (CAP) leverages community, Tribal, and industry collaboration to develop a strategy to mitigate air quality and regional climate change impacts through the implementation of energy conservation and renewable energy technology.

Our main objective is to help the community understand how harmful air emissions are impacting the community and climate change and educate the community on how renewable energy technologies, such as solar and wind, can reduce air emissions thus positively impacting the health of the community.

Community education will lead to knowledgeable stakeholder involvement in the development of implementation strategies for meeting the challenge of climate change.

Energy Conservation Action Steps

It is very important to start by clearly understanding the quantity of greenhouse gases emitted or conserved from each potential project and evaluate the impact to the tribal community.

The Tribes shall consider implementing the energy conservation and clean energy production mitigation measures described above by undertaking the following methodology:

- Develop an inventory of greenhouse gas emissions to quantify emissions from municipal buildings, fleets and equipment, solid waste, and landfills.
- Using this greenhouse gas emission inventory, compose a set of energy conservation projects.
- Distribute a survey to allow comment on these conservation projects by the Fort Hall Community.
- Prioritize the resulting conservation projects based upon cost, estimated benefit, and community comment.

Clean Energy Production Action Steps

The Tribes shall also consider implementing clean energy production mitigation measures by undertaking the following methodology:

- Quantify the Tribes current reliance on fossil fuel energy provides and evaluate the costs and benefits of switching to renewable energy providers.
- Develop a set of carbon offset projects, including local renewable energy projects.
- Distribute a survey to allow comment on these offset projects by the Fort Hall Community.
- Prioritize the resulting carbon offset projects based upon cost, estimated benefit, and community comment.

Conclusion

Greenhouse gas emissions and related air quality concerns are detrimental to the long-term sustainability of our people. The mitigation measures and implementation actions presented in this Community Action Plan have the potential to alleviate the effects climate change on the Fort Hall Reservation and realize the following benefits:

- ✓ Cost savings
- ✓ Energy security
- ✓ Job creation
- ✓ Human health and the environment
- ✓ Improving air quality

The Shoshone-Bannock Tribes have the opportunity to meet the challenge of climate change by adopting and implementing this Community Action Plan.

Once backed by the community, the Fort Hall Business Council can directly effect change through policy or program decisions and therefore promote regional energy conservation and clean energy production.

References

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