NATIONAL TRIBAL AIR ASSOCIATION
Status of Tribal Air Report 2015

National Tribal Forum on Air Quality

May 2015

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The National Tribal Air Association (NTAA)

The NTAA is a Tribal membership organization whose mission is to advance air quality management policies and programs consistent with the needs, interests, and unique legal status of federally recognized Tribes. The NTAA also serves as a communication liaison and information conduit between Tribes, EPA, and other federal agencies. The NTAA exists to assist Tribes in air quality policy work while respecting the fact that each Tribe has the right to a government-to-government relationship at the federal level. All federally recognized Tribes are eligible to become Member Tribes of the NTAA. Tools developed by the NTAA are available online for download and can be readily accessed by members of the public.

The goals of the NTAA:

- To advocate for and advance the development of Tribal air policy for the protection of environmental, cultural, and economic interests at all levels of government (Tribal, federal, state, local, and international);
- To promote the development, funding, and capacity building of Tribal air management programs;
- To promote and facilitate air quality policy and technical information that may include research, scientific and/or medical studies;
- To advance the recognition and acceptance of Tribal sovereign authority by conducting effective communication with and outreach to state, local, federal and international agencies, and to the general public; and
- To encourage and support appropriate consultation of state, local, federal and international agencies with all Tribal governments in accordance with Tribal structures and policies.

To learn more about the National Tribal Air Association, please visit: www.ntaatribalair.org.

Chairman of NTAA's Executive Committee's Address

Kwey-Ha!

Welcome to this latest iteration of the Status of Tribal Air Report. This is the product of a year-long process that re-starts the moment the report is published. It is successful due to many reasons, such as the ongoing collaboration between the Tribes located within each EPA designated region and the Executive Committee (EC) representative of each region, the NTAA and Office of Air and Radiation, the EPA regional offices and their work with the EC representatives, and our NTAA crew who make us all look good.

The information contained within this report is only as good as each source from which it is harvested. Should the reader find an error or omission or simply wishes to inquire further, there is a simple process for that, and the first step is to contact our offices. Our goals are truth, clarity and completeness in our reporting, and action for our concerns and recommendations. We do this work so that Tribes have a dedicated avenue to express their intentions that will reach the ears of the federal government in a direct manner. Our conduit runs both ways, as we disperse information from the federal government to Tribes in likewise manner.

Many thanks to our Executive Committee members, Policy Advisory Committee members, EPA colleagues, and the NTAA staff for their work and service to NTAA and NTAA's Member Tribes.

I would like to acknowledge the outstanding work of NTAA staff including the STAR's project lead, Cristina Gonzalez-Maddux and Project Director, Andy Bessler. As NTAA's Senior Research Specialist, Cristina has sifted through reams of documents and data sets and exchanged hundreds of emails in an effort to secure meaningful input and engagement in the STAR authorship process. The hope is that this document can help us all see a little more clearly how Tribal Air Programs are working and what is needed in order to bring cleaner, healthier air to Tribal communities.

It is a substantial task to coordinate our busy Executive Committee members and NTAA Member Tribes around input to the STAR and NTAA's ongoing policy work. To that end, I would also like to thank NTAA's Project Director, Andy Bessler for his contributions to the STAR and his continuing efforts to grow and support this organization. He has provided strong leadership and a solid programmatic foundation for NTAA to continue moving forward. I also wish to recognize Syndi Smallwood for her efforts in developing the Budget Analysis. Syndi served on the EC for many years and remains strongly committed to advancing Tribal air quality management through her contribution to the STAR and other activities.

The NTAA does one thing and we do it well: we serve Tribes in the field of Air Quality Policy.

On Behalf of the NTAA Executive Committee,

Bill Thompson, Chairman, NTAA

Table of Contents

Executive Summary

The National Tribal Air Association (NTAA) is pleased to present the 2015 Status of Tribal Air Report (STAR) to Tribal Nations, the US Environmental Protection Agency, and to other federal agencies and interested parties. The STAR outlines current conditions in Indian Country with respect to air quality management and provides recommendations to EPA to address the critical air quality issues and needs that face Indian Country.

The imperative for Tribes to manage their own air resources stems from concerns for the health of Tribal communities and an understanding that Tribes are the best equipped to manage their own lands and resources. Federally recognized Tribes in Indian Country have both an obligation to their respective communities to manage air quality as well as the legal authority to do so. The NTAA actively encourages Tribes who endeavor to manage their own air quality and supports the establishment of mutually respectful and fruitful partnerships between regulatory entities. The 2015 STAR provides a snapshot of Tribal air activities in Indian Country (e.g. emissions inventories, monitoring, permitting) and offers an overview of efforts undertaken by the NTAA in support of Tribal management of air resources (see Appendix B).

Tribes are extremely industrious and have a long-standing reputation for responsible environmental stewardship. In order to properly manage air quality programs and contribute to the larger national air protection effort, Tribes must be allotted sufficient financial support and technical training. The 2015 STAR describes some of the most pressing needs that Tribes throughout the nation have voiced regarding air quality management in Indian Country. The following summary of recommendations is presented for consideration by EPA and other federal and state agencies. In addition, topic-specific recommendations are included at the end of each section within the report.

Summary of Recommendations

- Tribal air quality programs continue to be cut, while the demand and need for Tribal air management only increases. Tribes recognize that air quality funding is limited, but additional funding for Tribal air quality programs must be made available to avoid serious backsliding in air quality protection.
- The issues that face each Tribe can be as varied as the Tribes themselves, thus it is imperative that federal agencies consult with Tribal leadership individually.
- Federal agencies need to demonstrate their commitment to Tribal sovereignty through (1) appropriate allocation of funding for Tribal air programs, (2) engaging proactively in government-to-government consultation with Tribal nations, (3) upholding their Trust responsibility by developing and implementing air programs that are responsive to the feedback provided by Tribes, and (4) responding to Tribal requests and recommendations in a timely manner.
- Each Tribe should have the opportunity and resources necessary to assess the quality of its airshed(s) in order to protect the health of Tribal members and Tribal lands, particularly in light of the many off-reservation sources of pollution.
- Monitoring and analysis partnerships between Tribes and other established air quality entities should be encouraged and funded.

Acronyms

AIEO	American Indian Environmental Office
ANTHC	Alaska Native Tribal Health Consortium
APA	Administrative Procedure Act
AQRV	Air Quality Related Value
AQS	Air Quality System
AWMA	Air & Waste Management Association
CAA	Clean Air Act
CAAAC	Clean Air Act Advisory Committee
CAFO	Concentrated Animal Feeding Operations
CFR	Code of Federal Regulations
DITCA	Direct Implementation Tribal Cooperative Agreements
EO	Executive Order
EPA	Environmental Protection Agency
EPM	Environmental Programs and Management Budget
FARR	Federal Air Rules for Reservations
FIP	Federal Implementation Plan
FR	Federal Register
HAP	Hazardous air pollutant
HUD	Housing and Urban Development
IAQ	Indoor air quality
IGAP	Indian General Assistance Program
IHS	Indian Health Service
ITCA	Intertribal Council of Arizona
MJO	Multijurisdictional organizations
mNSR	Minor New Source Rule
NAA	Non-attainment area
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NPM	National Program Manager
NSR	New Source Review
NTAA	National Tribal Air Association
NTF	National Tribal Forum on Air Quality
NTOC	National Tribal Operations Committee
OAR	Office of Air and Radiation
ODEQ	Oklahoma Department of Environmental Quality
OECA	Office of Enforcement and Compliance Assurance
OITA	Office of International and Tribal Affairs
OTAQ	Office of Transportation and Air Quality
OTS	OAR Tribal System
PAC	Policy Advisory Committee
PCB	Polychlorinated biphenyls
PM	Particulate matter
PPA	Performance Partnership Agreement
PRK	Policy Response Kit

QAPP	Quality Assurance Project Plan
RFP	Request for Proposal
RPO	Regional Planning Organization
RTOC	Regional Tribal Operations Committee
SIP	State Implementation Plan
SOP	Standard operating procedure
SRMT	Saint Regis Mohawk Tribe
STAG	State and Tribal Air Grant
TAC	Tribal Air Coordinator
TAMS	Tribal Air Monitoring Support Center
TAR	Tribal Authority Rule
TAS	Treatment in the same manner as a state
TEK	Traditional ecological knowledge
THHN	Tribal Healthy Homes Network
TIP	Tribal Implementation Plan
THHN	Tribal Healthy Homes Network
TSCA	Toxic Substance Control Act
USGS	United States Geological Service

Priorities for the Management of Air Quality

NTAA National and Regional Priorities

Each year, NTAA regional representatives consult with Tribes within their respective regions and report on several of the top priorities for air quality management. National and regional priorities are authored annually by Executive Committee members in response to the needs communicated to them by the Tribes within their region. The priorities reported in this section do not represent a comprehensive list, but rather a snapshot of the most commonly reported and pressing issues that Tribes are confronting nationally and within their regions.

NTAA National Priorities

EPA Tribal Air Program Funding
- Static or reduced, has led to existing programs being cut with no new programs coming in
- Aging monitoring equipment
- Inspector credentials program greatly reduced
- Tribal capacity has stalled or been reduced instead of more Tribes building capacity to assume programs

EPA Program Regression
- Reduction and continual re-education of EPA staff
- No travel funds for education of EPA staff or Tribal staff
- EPA lack of mentoring, technical support; in permitting, tracking of non-tribal project impacts
- EPA interdepartmental coordination on projects involving multi-media effects

Climate Change
- Create funding for Tribes which does not reduce other air quality program funds
- Adaptation planning
- Research - Predicted effects, particularly on traditional foods (Projections)
- Participating in the Clean Power Plan

Indoor Air Quality (IAQ)
- More technical support and assistance for Tribal staff to conduct IAQ assessments
- Water intrusion issues: mold and relative humidity
- Radon testing in Tribal homes and communities to determine exposure risks; Radon mitigation
- Lack of funding for IAQ activities in Indian Country
- Addressing asthma disparities

Mobile Sources
- On-road emissions: diesel exhaust, vehicle traffic

- Other: Construction equipment, shipping vessels (e.g. water and rail), and recreational vehicles

Oil and Gas Development
- Hydraulic fracturing, radon, radiation, aquifer contamination
- Permitting
- Methane Rule promulgation
- Tribal Minor NSR General Permit promulgation

Regional Haze
- Funding and Technical Support for Tribal Participation in Regional Planning Organizations (RPOs)

Ground Level Ozone Impacts
- Off reservation source impacts
- EPA monitoring funding for Tribes effected

Tribal New Source Review
- Implementation coordination with EPA regions, lack of communication

NTAA Regional Priorities

Region 1 – *Connecticut, Maine, New Hampshire, Rhode Island, Vermont*

- Particulate matter is our most problematic priority pollutant and originates from both local and regional sources
- Mercury emissions and deposition – It is unclear when our fish will be safe to eat?
- Climate change – particularly with regard to predicted increases in ozone, and its effects on human health and damage to vegetation
- Indoor air quality – mold and radon are especially problematic during the winter months when the houses are sealed for the winter
- Diesel exhaust – particularly in the winter months when large trucks and school buses are idling for long periods
- Regional haze and transport of other pollutants from off reservation

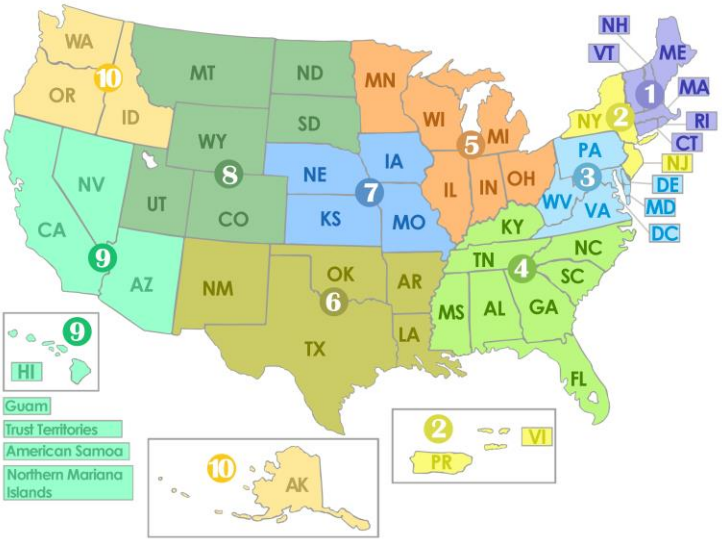

Figure 1. Map of USEPA Regions

Region 2 – *New Jersey, New York, Puerto Rico, US Virgin Islands*

- Industrial effects on Saint Regis Mohawk Tribe at Akwesasne
  - General Motors cleanup, shut down (2009) and demolished. Cleanup of contaminated soils is scheduled to continue through at least 2017
  - Alcoa - East plant pot lines permanently shut down May 2014
- IAQ
  - Environmental justice grant
  - New grant opportunities "Dioxin in Dust"
- Mobile Sources
  - Emissions from the international shipping industry; on-road/non-road
- Climate change adaptation and planning
- Hydraulic fracturing of Marcellus Shale

Region 4 – *Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee*

- Air program development and TAS
- Indoor air quality
- Climate change research/ adaptation planning incorporating traditional ecological knowledge (TEK)
- Increased dust pollution from drought caused by climate change
- Pollution from hydraulic fracturing
- Mercury transport and deposition in and on Tribal lands
- Increase Tribal Participation with Region 4 EPA

Region 5 – *Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin*

- Funding
  - Additional/expanding tribal air programs (33 Tribes in Tribal Air Resources Journal)
  - Established programs are operating in "keep the lights on" mode
- Monitoring
  - Class 1 re-designations – Air quality related values (AQRVs): establish baseline, determine trends and identify potential impacts
  - Losing ability to have regional snap shot
  - Air modeling/risk assessment
  - Wear and tear on monitoring instruments – no replacement, parts or funding
  - Mercury, particulate matter, ozone, and air toxics
    - Mercury: Production, deposition, impacts and regulation (No dry deposition, wet deposition and dispersion, few leaf litter projects)
- Tribal participation in the RPOs/MJOs
- Protection of Ceded Territories
- Climate change
  - Flora/fauna shifts: Moose, wild rice, Tullibee, traditional plants
  - Climate Change Adaptation: air emission reductions
- Indoor air quality: Radon, mold, healthy homes
  - Lack of technical support
  - Need solutions, Tribes are leveraging resources but there are few out there; more funding is needed

- Tribal mNSR
  - Lack of communication from Regional offices/staff
  - Details of Oklahoma Department of Environmental Quality (ODEQ) vs. EPA could have an impact on Tribes
- Lack of notification by States and EPA on enforcement issues on and near Reservations or within TAS boundaries

Region 6 – Louisiana, Arkansas, Oklahoma, New Mexico, Texas

- Development of ambient air monitoring programs - we only have a handful of developed programs at this time. We have approximately 8-10 Tribes in our Region that have received their first year of CAA Section 103 funding and are in the very early stages of program development. The tribal air programs that have been developed and that are stable (e.g. Quapaw Tribe, Delaware Nation) are providing information and assistance to younger, less established programs.
- IAQ projects and programs - There is a need for this in our tribal communities and the need for development of IAQ programs has not been fully realized
- Recognition and respect of Tribes as Sovereign Nations when it comes to air quality issues and future CAA Section 105 programs; currently ODEQ is not a willing partner in Tribal air program development; ODEQ and USEPA have been in a legal battle about regulatory authority in the state of Oklahoma and defining Tribal lands and the authority that Tribes have to regulate air throughout Oklahoma

Region 7 – Iowa, Kansas, Missouri, Nebraska

- Ground-level ozone transport from power plants and other sources.
- IAQ in Tribal homes and buildings.
- Concentrated animal feeding operations (CAFOs) and agricultural emissions.

Region 8 – Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming

- QAPP approvals
  - Follow turnaround schedule
  - Single crosswalk
  - Stronger mentoring

After numerous years of very few QAPP approvals, last year saw some tribes finally get their QAPP approved for regulatory monitoring. However, since that time the backsliding continued and the problems of the past are re-occurring. Example: Attempts to cut and paste parts of the nationally approved IMPROVE QAPP received comments and multiple crosswalk rejections.

- Responsive Tribal Assistance Program at the Region
  - Agency employee fallout, early retirement and non-backfilling of positions
  - No travel funds
  - Stronger mentoring

With Fiscal budget cuts the regional EPA office has instituted numerous employee buyout and early retirement functions. Unfortunately this has served to displace trusted

and experienced personal with new faces. Travel cuts in the region further alienate the relationships with tribal programs because of little or no face-to-face time.

- Oil and Gas Development
    - Permitting of oil and gas wells
    - Methane rule
    - Tribal NSR general permit for Oil and Gas

It is without question that Region 8 suffers the heaviest burden from Oil and Gas development. Questions remain about how soon will the Methane rule be passed and will it help address the Methane cloud over the San Juan airshed? There is the question of when will the minor Tribal NSR general permit for Oil and Gas be promulgated? There are numerous unanswered questions about hydraulic fracturing and its hazards such as radon and other radiation, plus damage due to spillage and water aquifers.

Regional Advancements: One tribe has successfully performed compliance inspection on 35 of 38 Part 70 permits. There is one remaining very large permit inspection to complete. By successfully transitioning this Part 70 program the tribe will be able to move this permit program from grant funded to self-sustaining by September of this year. Another tribe successfully prosecuted a burning ordinance case, which resulted in the offending party being incarcerated.

Ongoing Challenges: It is nearly unanimous that maintenance of effort with the limited funding resources remains as the most significant challenge to every tribe. Region eight has the majority of the largest tribal reservations in the nation and time and money to travel to the monitoring sites and enforce air quality regulations requires significant resources.

Region 9 – Arizona, California, Hawaii, Nevada

- Funding air programs for ***all*** Tribes who request them & targeted funding for mature air monitoring programs and regulatory programs
- Streamline the designation process
- Ensure consistent relationships between Tribes, EPA R9 Air Division, and Headquarters
- Realization that the majority of air pollution is from off-reservation sources
- Targeted emphasis and funding for Tribal indoor air programs
- Recognition of the Tribal Authority Rule (TAR)
- Specific guidance for Tribes on exceptional events
- Additional consultation with respect to proposed ground level ozone standard with both TAS & non-TAS Tribes & targeted funding for those Tribes affected by new ozone standards
- Provide resources for Tribes to develop their own template database for utilization of all Tribes and compatible with existing USEPA programs (e.g. ICIS-Air)

Region 10 – Idaho, Oregon, Washington

- EPA funding to Tribes has been cut (10-15% for FY2016) while more Tribes have increased their environmental responsibilities so capacity building has stalled with no new programs coming on. The region therefore has to apportion less money among more Tribal program needs.
- EPA interdepartmental coordination on projects involving multi-media effects and cross-departmental responsibility such as CERCLA projects with air quality regulatory concerns.
- Deposition of various airborne pollutants, including radiation from Fukushima
- Cut in Radon funding, technical support and free testing resources for Tribes and EJ communities
- Lacking technical resources for Permit review from EPA for Tribes
- EPA staffing cutbacks: in Region 10, there have been over 100 unfilled positions in the last 10 years - this is affecting the Tribes ability to rely on EPA technical support.
- EPA technical support for indoor air quality concerns, particularly on asbestos surveys and remediation and funding for outreach such as school classroom projects
- Reductions in Office of Enforcement and Compliance Assurance (OECA) funding to regions for funding the Tribal inspector program, particularly around credential renewal and program support.
- Inability for Tribes to collect fees under the current FARR program to increase sustainability and to support their burn permitting programs.
- Climate change and Tribal adaptation plans (using additional funds that do not take away from existing funds).
- Smoke management coordination (wildfires and prescribed burning).
- Participation in Regional Haze RPOs
- FARR revision process has been stalled. Tribes have not received consultation or updates on the revisions, which have only been shared internally within EPA.

Region 10 – Alaska[1]

- Impacts of climate change in rural Alaska
- Improvement of indoor air quality (IAQ) in Tribal homes
- Road dust in villages
- Impacts of fugitive dust from mining operations
- Open burning/land fill burning
- Funding presents a major challenge to Alaska Native Villages who are not eligible to receive federal monies designated for Tribes with reservation lands
- Fukushima radiation
- Asian haze
- Cruise ship emissions
- Lead in rural airports from small airplanes (e.g. Cessna 207)

[1] Note: Although technically Alaska falls within EPA Region 10, Alaska priorities are identified separately because the needs of these communities are unique and varied and merit specific recognition.

Tribal Air Quality Program Funding Needs are Critical

Several regions have expressed concern about the stagnation and reduction of tribal air program funding. Tribes throughout the nation are becoming better equipped and increasingly interested in operating Clean Air Act programs on their respective lands, yet no new funds have been made available by EPA. The NTAA is aware that Congressional allocations for EPA's overall budget have not increased substantially over time and that this trend has paralleled the stagnation or reduction of tribal air program funding.

The NTAA is deeply concerned that the present funding situation has resulted in established programs having to compete with newly emerging programs and that general competition among Tribes for air program funding is increasing. This outcome is not acceptable to the NTAA because as sovereign nations, federally recognized Tribes should be furnished with sufficient funding to support air programs without having to compete with other Tribes. The approval process for funding requests should be based on the merit of individual proposals and not dictated by an absence of funds.

There is also an increase in Tribes being Federally recognized following revisions to Regulations on Federal Acknowledgement of Indian Tribes by the US Department of the Interior. It is assumed that with the current funding scenario, additional federally recognized Tribes will be forced to complete for an even lesser amount of EPA air monies.

EPA Tribal Air Coordinators recently provided summary data on the percent of tribal requests that are ultimately funded. By and large, with few exceptions, the data indicates that 100% of tribal proposals that are submitted are funded. This does not speak necessary to what percent of the individual funding request is allotted, however, it does suggest that all proposals are funded. Interestingly, regional EC members have reported that the 100% funding trend is indicative of the fact that many Tribes no longer apply for funding in the knowledge that no additional grant monies will be made available to regions from headquarters offices. It seems that after multiple rejected funding requests, these Tribes simply give up on the prospect of securing monetary support to run CAA programs. Tribes that have succeeded in securing monies in past years meanwhile, continue successfully applying and though their expenses may increase, and the overall demand for new program funding is ever increasing, CAA funds remain stagnant or reduced.

Recommendations

- Increase funding for Tribal air programs through both IGAP and CAA §103/§105 STAG funding streams so that (1) established programs can continue operating and increase their program capacity, and (2) new programs throughout Indian Country can be established.
- Work to improve communications and coordination between Tribes and federal agencies pursuant to the ongoing requests of Tribes (e.g. open and ongoing

communications between EPA regional offices and Tribal governments; between Tribes and EPA headquarters).

- Improve internal communications within the agency (EPA) to ensure that regional and headquarters offices are working in tandem to fulfill their trust responsibilities to Tribes.
- Provide Tribally-specific outreach regarding NAAQS revisions (e.g. ozone NAAQS revision in 2015) and help Tribes to understand the management implications for their air quality programs.
- Both Tribes and the EPA suffer when there is insufficient funding to support EPA program staff. Crucial services from EPA are necessarily delayed or discontinued in response to reduced staff support (e.g. QAPP processing and approval, mentorship). Additional funding of the overall EPA budget is needed in order to reinstate EPA staff that are heavily relied upon and utilized by Tribes for technical support and mentorship.
- Revisions to the FARR in Region 10 are needed in order to increase equity for Tribes (e.g. allowing for the collection of fees to support burn programs).
- Reinstate EPA funding for inspector credential review certification and program support through OECA.

Unique Concerns for Air Quality Management in Indian Country

Environmental Justice

In July of 2014 EPA Administrator McCarthy issued the USEPA's *Policy on Environmental Justice for Working with Federally Recognized Tribes and Indigenous Peoples*. The policy was a welcome and much anticipated effort on the part of EPA and an important follow up to the 2011 *Memorandum of Understanding on Environmental Justice and Executive Order 12898*. The MOU provided that, "All too often, low-income, minority and Native Americans live in the shadows of our society's worst pollution, facing disproportionate health impacts and greater obstacles to economic growth in communities that can't attract businesses and new jobs (U.S. EPA, 2011)."

Climate Change

Last year, the EPA published the third edition of the report titled, "Climate Change Indicators in the United States". The report detailed the measurable changes taking place throughout the U.S. as a result of climate change. Unlike the assessment reports published by the Intergovernmental Panel on Climate Change, which include climate *projections*, the indicators report details *observed* climate-driven changes that have occurred in recent years. These climate indicators cover a variety of sectors including weather and climate, health and society, ecosystems, oceans, snow (pack, cover, and snowfall) and ice (lake and artic sea ice).[2]

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[2] **Adaptation –** The earth's climate is changing rapidly and climate-driven impacts have already been observed around the world. Adaptation planning is a tool that tribes can employ to effectively evaluate climate impacts on tribal lands and develop adaptation strategies that will protect important cultural and natural resources from such impacts. **Mitigation –** Human activities can contribute to climate change through the release of greenhouse gases. Mitigation generally refers to the reduction of greenhouse gas emissions through actions. Actions vary in scale and may include simple changes on the individual level

For many years, Tribes and Alaska Native Villages have witnessed the impacts of changing regimes on the landscape. Complex social and political drivers have led to transitions in land use, species diversity, and abundance of plants and wildlife on tribal lands. In more recent years, climate change has emerged on the forefront as a global crisis with increasingly severe impacts. More so than any other group, indigenous peoples, particularly place-based Tribal communities are imperiled by climate change. Many of the natural resources and landscape features upon which Tribes rely for cultural and traditional practices, may disappear in a rapidly changing world.

In an effort to preserve culture and ensure continued access to key resources like subsistence species, many Tribes have begun developing climate adaptation plans. A short list of these tribal climate adaptation plans can be found in Appendix D of the 2014 STAR[3]. In addition, the 2014 STAR provided an overview of climate impacts throughout the nation, on a region-by-region basis.

Jurisdictional Issues and Trans-boundary Pollution

Pollution knows no political boundaries. Tribes as sovereign nations have the legal capacity to manage air resources within the boundaries of tribal lands; however, they have limited recourse to address nearby off-reservation pollution sources. In this year's suite of regional priorities, multiple regions voiced concerns over off-reservation sources, particularly with respect to regional haze, ground-level ozone[4] from neighboring electric generating units (e.g. coal-fired power plants), and deposition of toxic metals transported from major polluters.

Regional haze has been an ongoing concern for many Tribes. In some instances major pollution sources are located on Tribal lands however, the regions report that the majority of major polluters are located off-reservation. The health and welfare implications of off-reservation sources are real as evidenced by the table in Appendix F, "National List of Nonattainment or Maintenance Areas Containing Tribal Lands." As the list indicates, there are nearly 200[5] non-attainment or maintenance areas throughout the nation containing tribal lands.

Industrial Operations Near Tribal Lands

Ambient air is comprised of nitrogen, oxygen, and argon gases as well as a whole host of criteria and hazardous air pollutants that vary in concentration as a function of proximity to air pollution sources, geographic location, and weather patterns. Tribal concerns regarding specific ambient air pollutants are as varied as the composition of the air itself and in many instances, dictated by the major sources of pollution that are proximal to tribal lands. Two of the most commonly referenced ambient pollution

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(e.g. biking rather than driving) or the national or international level through the adoption of progressive legislation geared toward reducing GHG emissions.

[3] The 2014 STAR can be accessed on the NTAA website at http://www4.nau.edu/itep/ntaa/resources/status-of-tribal-air-reports.asp.

[4] It should be noted that ozone can form within Tribal airsheds as a result of transport of precursor pollutants onto Tribal lands from adjacent jurisdictions. Some Tribes have reported this as a major concern.

[5] Approximately 150 of these areas are located within Region 9.

categories of concern in the 2015 regional priorities are hazardous air pollutants (HAPs), including mercury, and volatile organic compounds (VOCs) from oil and gas development[6]. Other regional priorities regarding ambient air pollutants included toxic metals from industrial facilities near Tribal lands, smoke from burning rubbish and from forest fires, and finally, particulate matter (PM) and fugitive dust from unpaved roads and industrial activities (e.g. mining and construction).

Recommendations

- Healthy air is imperative to supporting healthy communities. As such, Tribes should be encouraged to take an active role in the shared task of managing regional air quality and be supported in their endeavors to do so. NTAA strongly encourages EPA to provide funding for tribal participation in regional planning organizations (RPOs), multijurisdictional organizations (MJOs), and similar organizations along with EPA, state regulatory agencies, and regional stakeholders.
- Provide resources for Tribes to develop their own databases using well-developed templates (e.g. Tribal Data Toolbox) that can be used to manage air quality and meteorological data. Also, provide funding for Tribes to purchase or develop facility databases for permitting activities.
- Federal agencies should work with Tribes to provide technical climate change adaptation planning assistance, as well as resources to support the development of adaptation plans. Developing and implementing sound adaptation strategies will be crucial for Tribes in order to protect key resources and Tribal lifeways.
- Tribes may require assistance with the identification of downscaled climate models or interpretation of complex regional climate models. EPA and other agencies such as the USGS are well positioned, in terms of training and expertise, to assist Tribes in the interpretation of such data.
- EPA should work with Tribes on strategies to manage air resources that may be compromised by climate change (e.g. increased ozone formation, greater frequency and intensity of dust storms in arid regions of the country).
- Several regions reported concerns with the rapid development of oil and gas operations in the absence of clear methane regulations. In keeping with this shared priority, the NTAA submitted a letter to Administrator McCarthy on December 9, 2014 voicing its support of methane regulation for the rapidly expanding oil and natural gas industry. EPA needs to do more by better regulating the emissions of greenhouse gases, in particular methane.

Indoor Air Quality Concerns in Indian Country

Healthy indoor air quality is critical particularly given the fact that Americans spend, on average, up to 90% of their time indoors where pollutant concentrations can be 2-5 times (up to 100 times!) as high as ambient air (USEPA 2013).

In 2015, several regions communicated concerns regarding indoor air quality (IAQ) within tribal communities. EC members reported the need to address: (1) mold and

[6] This is a complex issue given that some oil and gas development is occurring on Tribal lands.

radon issues within tribal homes and buildings, particularly during the winter; (2) the need for technical training for IAQ assessments (e.g. asbestos surveys) and remediation of indoor air hazards to be conducted by tribal staff within tribal communities; (3) recognition of the value and importance of healthy indoor air by federal funding entities manifesting in the form of fiscal support for tribal IAQ programs.

In order to better understand the status of USEPA-sponsored indoor air quality programs within Indian Country, NTAA submitted a data request to regional Tribal Air Contacts (TACs) throughout the nation. The TACS were asked to provide a brief summary outlining Tribal IAQ programs and activities funded using EPA monies. The results of this query are summarized below.

Region 1 - Currently 5 Tribes are operating IAQ programs and most of these focus on addressing mold issues, testing for radon, second hand smoke, wood smoke indoors and general IAQ. Some Tribes are more active than others and some have testing equipment and also have response protocols to address concerns as tribal members report them. There is no budget line item for IAQ work in their work plans but IAQ is addressed alongside their general air quality work.

Region 2 – Although no data was available from EPA Region 2, the EC representative for Region 2 provided the following update on the Saint Regis Mohawk Tribe's (SRMT) IAQ activities:
SRMT provides IAQ assessments for residential and office buildings. The IAQ assessments provide property owners with inspection reports and mitigation recommendations. SRMT also provides education and outreach to the tribal community on asthma triggers, environmental tobacco smoke, weatherization and moisture intrusion, and energy efficiency. The SRMT has done a special study for IAQ and under an Environmental Justice Grant homeowners were educated on reducing their exposure to indoor pollutants. The SRMT will begin a new IAQ study involving dust sampling in homes for polychlorinated biphenyls (PCBs) and dioxin pollutants that may have come from the nearby superfund site. This study will start mid-2015 and go through 2016.

Region 4 - There are no Tribes with a formal or well-developed IAQ program. For FY14, two Tribes had CAA §105/103 funds to do IAQ work: one tribe handed out radon kits to the interested tribal residents and the other tribe had funds to respond to tribal members requests for mold assessments.

Region 5 - Twelve (12) Region 5 Tribes are utilizing a portion of their Clean Air Act §103/105 grant funding to perform indoor air quality (IAQ) work. These IAQ activities include residential and office building IAQ assessments and providing property owners with inspection reports and mitigation recommendations, and education and outreach to the tribal community on asthma triggers, environmental tobacco smoke, weatherization and moisture intrusion, and energy efficiency. Some Tribes have utilized a portion of their §103/105 grant dollars to acquire IAQ sampling and testing equipment including flow meters, particle counters, moisture meters, fiber optic and FLIR cameras, and blower doors. EPA Region 5 does not fund the actual follow-up mitigation activities to

rectify IAQ issues at this time due to federal statutory limitations. Several Tribes have participated in IAQ-related voluntary programs over the years such as the Tools for Schools initiative and Energy Star.

While STAG funds via 103/105 grants are the backbone for funding IAQ activities in Region 5, approximately ten Region 5 Tribes have utilized a portion of their General Assistance Program grants to acquire equipment and perform IAQ assessments and education and outreach as well. Additionally, Region 5 typically includes a set-aside of funds from the State Indoor Radon Grant Program for Tribes to perform radon assessments. Many Region 5 Tribes have received State Indoor Radon Grant Program (SIRG) grants for radon testing and demonstration projects over the years and we currently have 3 Tribes with active SIRG grants.

Finally, in 2012 Region 5 was able to secure EPM funding from the Office of Air and Radiation to host a Clean and Healthy Tribal Casino Workshop and provide training on improving IAQ in casinos and related tribal hotels/lodges.

Region 6 - Historically, Region 6 has primarily used its CAA §103/105 allocation to fund ambient air projects. In recent years, more and more funds have been awarded in support of IAQ activities for training and general assessments related to moisture and mold in Tribal homes and buildings. In FY'2013, of the 8 awards funded, 2 specified IAQ activities. However, after reviewing progress reports of the 8 grants funded overall, it became clear that more than the 2 Tribes were actually conducting IAQ activities (such as training and participation on IAQ workgroups/conference calls). Approximately six Tribes were actually using funds to build IAQ capacity and conduct assessments. In FY'2014…of the 10 awards funded, 5 Tribes indicated IAQ activities in their work plans.

Region 7 - Each of the seven R7 Tribes with CAA §103 grants has funded indoor air activities during the last several years. Many of these activities have involved radon testing and/or outreach regarding asthma, radon, mold, smoking, healthy indoor environments, and other educational topics. This would be difficult to quantify because, in many cases, specific dollar amounts have not been allocated to the activities and they are part of larger work plans involving ambient air, pollution reduction, and energy related activities.

Region 8

For FY 13/14, Tribes implementing indoor air work included:

- Southern Ute Reservation, doing a wood stove exchange program
- Blackfeet Reservation. Part time indoor air work, including education and enforcement of their tribal wood burning stove rule, which has an effect on IAQ.
- Spirit Lake. They had a full time Indoor Air Coordinator.

For FY 14/15, Tribes implementing indoor air work included:

- Southern Ute Reservation, doing a wood stove exchange program
- Blackfeet Reservation. Same as FY 14.
- Spirit Lake. Same as FY 14.
- Sisseton Wahpeton Reservation. They have a full time Indoor Air Program Director.

- Standing Rock. They have a part time Indoor Air Program.
- Ute Mountain. They have a small Radon component in their work plan.
- Northern Cheyenne. They are attempting to get a Radon component started.

Region 9 – Region 9 has not funded any Indoor Air Quality (IAQ) programs on their own, due to lack of specific IAQ funding. Twelve Region 9 Tribes include IAQ tasks in their Clean Air Act grant work plans. In addition, Region 9 funds one Tribe for radon activities and one for asbestos removal activities. Although these are not technically considered IAQ for this question's purpose, Region 9 asked to make a note of them.

Region 10 - Approximately 11 Tribes/tribal consortia do indoor air work funded with CAA grants and approximately 43 Tribes conduct indoor air work with GAP grants.

Based on the current tribal IAQ programs in operation, it appears that tribal funding for IAQ programs is generally characterized as follows:
- Tribes may utilize CAA §103/105 grants as well as GAP monies to fund IAQ activities, though there are limited or no funds specifically allocated toward IAQ activities in certain regions
- Many Tribes weave IAQ activities into their daily jobs although these activities may not be specifically outlined in their USEPA work plans. Consequently, the figures presented above may be an underrepresentation of the IAQ activities taking place in Indian Country by virtue of the fact that many Tribes are resourceful and have managed to support IAQ activities using very limited funds or funds provided by other federal and state funding sources (e.g. US Department of Housing and Urban Development [HUD] or Indian Health Services [IHS]).
- Alaska Native Villages have used CAA funds in creative ways to advance IAQ throughout Alaska. For example, the Aleknagik Traditional Council along with other project partners recently created an educational video called *Let's Clear the Air: Simple Steps to a Healthier Home*. The video production was sponsored through an Alaska Native Tribal Health Consortium-managed mini-grant and has served as a valuable education and outreach tool that offers cost-effective measures for reducing indoor air pollution.

Recommendations

- Continue providing technical IAQ training to Tribes through the American Indian Air Quality Training Program (e.g. the Indoor Air Quality in Tribal Communities, Indoor Air Quality Diagnostic Tools, and Indoor Air Quality in Alaska Native Villages courses).
- Assist Tribes to locate and secure funding for training and program support from agencies with available resources. As necessary, federal agencies should coordinate their efforts in order to leverage different funding streams and ultimately provide Tribes with sufficient resources to properly manage IAQ in Indian Country.
    - For instance, in FY2105, the Budget of the U.S. Government included a net $46.7 billion allocation toward HUD; the same budget included an overall allocation of $7.9 billion for the USEPA (OMB 2015). Of the $46.7 billion within the HUD budget, $650 million were specifically designated to address

"the housing needs of Native Americans". Tribes would benefit greatly if these two federal agencies could work collaboratively to support the technical training and programmatic expenses inherent to managing IAQ in tribal communities.

- Ensure that all EPA Regions make IAQ monies available to Tribes requesting support.

Training and Support Needs for Tribes

In 2014, the Tribal Air Monitoring Support Center (TAMS) published a report, titled "Tribal Air Monitoring Support Center Steering Committee Technical Needs Assessment Report And Implementation Plan[7]". The TAMS Center, which was formed in 1999 through a partnership between EPA and the Institute for Tribal Environmental Professionals (ITEP), provides training courses, professional assistance, equipment loans[8], the school air toxics monitoring program, gravimetric laboratory services, and IAQ diagnostic equipment loans and technical support.

The TAMS report synthesizes several major technical training and support needs identified within Indian Country as follows:

1. Continuous Ambient Air Monitoring/IAQ Diagnostic Equipment – Not surprisingly this need corresponds with a priority regarding air quality monitoring that was reiterated by several regional EC representatives. According to the needs assessment, the main focal areas for continuous ambient monitoring are professional assistance and training. Needs related to IAQ diagnostic support for Tribes, in turn focused on the equipment loan program and professional assistance and training.

2. Air Monitoring Data Reporting/Other Criteria Pollutant Air Monitoring – The greatest need related to reporting of air monitoring data by Tribes was found to be training (both online and in-person) as well as professional assistance. Similarly for the "other" category of air monitoring needs assessment, respondents indicated a need for training and professional assistance.

3. Quality Assurance Documentation: QAPPs & SOPs/Emissions Inventories – For both items, respondents indicated the need for training (e.g. Turbo QAPP) and professional assistance.

Training and program development needs vary between regions and between Tribes. This variance obviates the importance of effective communications between Tribes and EPA regional staff as well as the need for tailored training opportunities. To this end, the NTAA was very pleased to receive summary data from the regional TACs outlining current training available on the regional level.

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[7] This report can be accessed online at http://www4.nau.edu/itep/ntaa/tribal-air-programs/docs/TAMSTechAssReport.pdf.

[8] For instruments that monitor mercury, particulate matter, ozone, mercury, VOCs, and indoor air pollutants.

The dialogue regarding training and technical support needs will be an ongoing and evolving one, but the preliminary data provided through the TAMS Center report (summarized above) and the TACs offers a general overview of the current training needs and offerings.

The summarized results of the TAC data query are listed below.

- Most TACs cited the American Indian Air Quality Training Program (AIAQTP) and the TAMS Center (which is a component of the AIAQTP grant) as the main sources of air quality training for tribal staff and the greatest source of investment in tribal air training on the part of EPA.
    - Several TACs made mention other training resources available to Tribes at the national level, including the EPA's Air Pollution Training Institute (APTI), the EPA's National Tribal Air Program webpage, the AIEO Tribal Portal webpage, and regional tribal webpages (e.g. Tribal Air Programs in the Pacific Southwest**)**
- Some EPA staff reported that they too will participate in or assist with national and regional tribal trainings (specific topics included Tribal NSR, the GAP grant process, and air monitoring)
- **Regional Tribal funding guidance documents** included the Region 9 (R9) Guidelines for Tribal Air Funding, Project Officers for R9 Tribal Air Grants, and R9 Tribal Clean Air Act Funding Announcement
- **Tribal permitting guidance documents** included the Clean Air Act Requirements for Air Pollution Sources in Indian Country (R9), and Clean Air Compliance Guide for Indian Country (R9)
- **One-on-one technical training/support** was identified by TACs in a couple of regions. One-on-one support with tribal staff generally applied to permitting programs, AQS data submission, and other technically complex endeavors.
- **Regional meetings/conferences** were referenced by TACs as a good training venue.
- Similarly, **Regional TAC calls and RTOC calls** were mentioned as a good venue for training or for discussing training needs
    - In some regions, the topics discussed during the TAC or RTOC calls lead to follow up work sessions on issues that the Tribes find to be of particular importance (e.g. regional haze, NAAQS designations, individual polluting facilities)
- In Region 10, the **Alaska Native Tribal Health Consortium (ANTHC) and Tribal Healthy Homes Network (THHN)** both provide training and webinars through the use of CAA §103 monies. Region 10 has also developed the Alaska Tribal Air Toolkit and a set of Alaska-specific IGAP sample workplan templates
- Another training opportunity that was identified by TACs is **region-wide trainings** (e.g. workshops, webinars) that are not tribally specific but rather applicable to many regulatory entities (e.g. NESHAPs, air toxics)

Recommendations

- Develop and administer a comprehensive national needs assessment for Tribes regarding funding and programmatic needs for tribal air programs. This assessment would explore the efficacy of existing EPA support and outreach efforts and could identify ways to improve upon these efforts.
- Offer technical training for Tribes on the permit review process

The Role of Tribal Governments in Protecting Air Quality

Tools for Managing AQ in Indian Country

Tribal customs, practices, and priorities vary greatly from one tribe to the next, so too do approaches to air quality management.

The EPA's American Indian Environmental Office (AIEO) website outlines several of the most pertinent Executive Orders (EO) and USEPA policies influencing relations between the agency and tribal governments. Among the most oft referenced policies, are the 1984 *EPA Indian Policy*, which Administrator McCarthy reaffirmed in 2014, and *EPA's Policy on Consultation and Coordination with Indian Tribes*, which was issued in response to *EO 13175, Consultation and Coordination with Indian Tribal Governments*. These Executive Orders and Policies collectively provide a framework that the USEPA and Tribal governments can employ to ensure that Tribal sovereignty is honored in Tribal-federal government-to-government relations.

Tribal air programs most frequently work with the Office of Air and Radiation (OAR) and the Office of International and Tribal Affairs (OITA). An organizational chart of the two offices can be found in Appendix E. On the regional level, Tribes interact with regional staff and in particular, Tribal Air Coordinators (TACs).

Regarding Tribal management of air quality, EPA has provided clear authorization for Tribes to obtain delegation of federal authority under specific sections of the CAA through the Tribal Authority Rule (TAR) (U.S. EPA, 1998). Section 301(d) of the 1990 Amendments to the CAA authorized the USEPA to treat Indian Tribes in a manner similar to States, and required EPA to issue a rule by June 15, 1992 that specified the provisions of the Act for which it was appropriate to treat Tribes in this manner. In February 1998, EPA complied with this requirement by finalizing the TAR. The TAR authorizes Tribes within Indian Country to obtain delegation of federal authority to implement CAA programs, or parts of programs, as appropriate, based on their priorities, goals, and objectives. The TAR is one of the strongest examples of a Tribal government's ability to assert its right of sovereignty and self-determination over pollution sources within the exterior boundaries of its reservation. It also clarifies the assertion of Tribal jurisdictional authority within the exterior boundaries of a given reservation.

Treatment in the same manner as a state (TAS) is also known as Eligibility Determination. A Tribe can exercise authority under a particular CAA section, by

demonstrating to EPA that it: (1) is federally recognized by the Secretary of the Interior; (2) has a governing body carrying out substantial governmental duties and powers; (3) the functions to be exercised by the Tribe pertain to the management and protection of air resources within the exterior boundaries of the reservation or other areas within the Tribe's jurisdiction; and (4) is capable of implementing the program consistent with the CAA and applicable regulations (U.S. EPA, 2013). The Tribe must also identify the exterior boundaries of the reservation and, for non-reservation areas, must demonstrate its basis for jurisdiction. Under Section 301(d) of the CAA and the TAR, eligible Tribes can be treated in the same manner as a state for elements of several CAA programs.

Oklahoma Case

Recent court challenges have brought potentially significant changes to the TAR. As described in the 2014 NTAA White Paper, the state of Oklahoma contended, and the Circuit Court of Appeals for the District of Columbia agreed that the Indian Country NSR Rule is arbitrary and capricious, in violation of the Administrative Procedure Act (APA), 5 U.S.C. § 706(2)(A) because the regulatory gap upon which the EPA premised the Rule simply does not exist. The courts found that each state's SIP applies to all non-reservation Indian country within its geographic borders except where a Tribe has demonstrated its inherent jurisdiction. Because non-reservation Indian Country is always covered by a SIP unless it has been displaced by a tribal implementation plan (TIP), there is no regulatory gap to be filled by a FIP[9].

The EPA's appeal for a rehearing before the full DC Circuit Court was granted but the full Court sustained the original panel's decision. EPA opted not to appeal the Circuit Court's decision to the Supreme Court and is now considering how the Court's ruling will impact EPA's process for reviewing State Implementation Plans (SIPs) where Indian country may be involved.[10]

Tribal Sovereignty and Consultation and Coordination with Federal Agencies

In the process of managing air quality within Indian Country, Tribes must partner with federal and state environmental regulatory agencies in many capacities. One of the most consistent messages echoed over time from Tribes to federal agencies regarding consultation is to consult early and consult often. NTAA recently commended the Office of Air and Radiation for embracing this policy by way of a comment letter regarding their National Program Manager Guidances (NPM) document. In the 2015 publication, OAR acknowledged its role in and obligation to consult with Tribes regarding air quality management. This was one of many instances of EPA offices taking an active role in the Tribal-federal agency consultation responsibility.

Nonetheless, ongoing challenges persist in some regions between Tribes and other regulatory entities, particularly states and EPA headquarters and regional offices. Much work remains to be done in the way of relationship building and effective communications. The most common concerns in this arena that were voiced by Tribes

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[9]Oklahoma Dept. of Envtl. Quality v. Envtl. Prot. Agency, 740 F.3d 185, 2014 U.S. App. LEXIS 931 (D.C. Cir. 2014) http://www.modrall.com/Files/Docs/ODEQOpinion01-17-14.pdf

[10] http://www4.nau.edu/itep/ntaa/resources/docs/NTAA_WhitePaper-SummaryTASIssues.pdf

and can be summarized as follows: (1) Recognition and acknowledgement of the TAR by environmental regulatory agencies, both federal and state alike; (2) Poor inter- and intra-agency communications with EPA and the Tribes, particularly at the regional level; (3) Lack of training for EPA Regional and National staff; (4) Insufficient travel funds for education of EPA staff or Tribal staff; (5) EPA lack of mentoring and technical support in permitting, and tracking of non-Tribal project impacts; (6) EPA interdepartmental coordination on projects involving multiple types of environmental media (e.g. water and air).

Funding Avenues for Tribal Programs

The vast majority[11] of Tribal air programs are funded by EPA grants, normally through the Indian Environmental General Assistance Program (IGAP) and Clean Air Act §103 and §105 STAG grants[12]. In November of 2013, the EPA reissued an important guidance document called *The Tribal Air Grants Framework: a Menu of Options for Developing Tribal Air Grant Work Plans and Managing Grants for Environmental Results*. The previous iteration had been released in 2005.

This document outlines the key elements for a successful §103/§105 CAA funding request for the following suite of tasks: administration and infrastructure development; air quality monitoring activities; air toxics risk reduction; basic air quality issues assessment; diesel emission reduction projects; emissions inventories; energy efficient and greenhouse gas reduction; FARR implementation (in R10 only); indoor air quality assessment and training; local or unique air quality issues; participation in policy development groups; radon risk reduction; road dust emissions; and rulemaking and enforcement.

The report has detailed the many unique challenges inherent with managing air quality in Indian Country as well as made reference to the unique status of federally recognized Tribes as sovereigns. EPA has a federal trust responsibility to work with Tribes on the development of successful air quality management strategies for Tribal lands.

Tribal Accomplishments in Air Quality Management

Tribes throughout the nation have been making major contributions to air quality protection while exercising their Tribal sovereignty through air quality management activities. EPA's Office of Air and Radiation provides an annual data summary[13] to NTAA upon request which details Tribal air activities. These activities include air quality monitoring (see Table 1.), TAS submittals (see Table 2.), permitting programs (see Table 3.), creation of emissions inventories, development of environmental quality regulations, and diesel emission reduction projects (see Table 4.). Also, in 2014, EPA issued over 700 environmental grants to 146 Tribes throughout the nation (see Table 5.).

[11] Exceptions certainly exist in which Tribes fund their own tribal air programs using internally generated revenue.
[12] Note: See Appendix A for a Tribal air program full budget analysis.
[13] Data is queried from the OAR Tribal System (OTS) database.

The bulk of the grant administered - approximately 92% - were CAA §103 and §105 grants. Both the CAA and IGAP grant distributions are outlined in Table 5. These funds supported vital air quality management activities in Indian Country, the benefits of which expanded beyond the borders of Indian Country by improving air quality overall.

Table 4. provides a summary of tribal projects that have occurred within each calendar year from 2012-2015. As the data indicates, tribal projects related to *emissions inventories, TAS, and regulations* have remained consistent over the past several years. Meanwhile, *permitting* activities nearly doubled from 2012 to the first quarter of 2015. This increase suggests that both capacity and interest in regulatory oversight of sources within Indian Country is growing.

Air quality monitoring is one of the many valuable activities taking place in Indian Country. Monitoring benefits both individual Tribes as well as communities in neighboring areas. The 2014 publication of the American Lung Association's State of Air Report[14] identified the need for increased monitoring and the gaps in monitoring data that exist throughout the nation. Given proper support and technical training for new staff, Tribes could be a major contributor to national monitoring networks and help to fill the data gaps.

A detailed table of AQS monitoring sites and data submissions can be found in Appendix D. The table provides multi-year long data from 2000-2014 on Tribal air monitoring sites and the number of Tribes submitting data to AQS. An important caveat is that the information presented in both Table 1 and Appendix D reflects only data reported to AQS. Tribes are involved in many air quality monitoring networks throughout the nation including the Interagency Monitoring of Protected Visual Environments (IMPROVE) network, National Atmospheric Deposition Program Mercury Deposition Network (NADP/MDN), Clean Air Status and Trends Network (CASNET), National Core (NCore) Multi-pollutant Network (NCOR), National Atmospheric Deposition Program National Trends Network (NADP/NTN), National Atmospheric Deposition Program Atmospheric Integrated Research Monitoring Network (NADP/AIRMoN), National Atmospheric Deposition Program Ammonia Monitoring Network (NADP/AMoN), and the School Air Toxics Monitoring Program[15]. Tribal contributions to these monitoring networks cannot be overstated as they help to fill in national data gaps regarding ambient air quality and pollutant transport and deposition.

Table 1. National Tribal Air Monitoring Summary Report for 2014

[14] The American Lung Association State of the Air 2014 report can be accessed at http://www.stateoftheair.org/2014/assets/ALA-SOTA-2014-Full.pdf.

[15] Up to date information on Tribal participation in national monitoring networks was not readily available. The most recent data, which was from 2012, lists the following number of sites and tribes participating in the various networks: IMPROVE 8 sites hosted by 8 Tribes; NADP/MDN 9 sites hosted by 9 Tribes; CASNET 5 sites hosted by 5 Tribes; NCOR 1 site hosted by 1 Tribe; NADP/NTN 5 sites hosted by 5 Tribes; NADP/AMoN 2 sites hosted by 2 Tribes; NADP/AIRMoN 0 sites hosted by 0 Tribes.

(Data based on AQS submissions)

EPA Region	All Data Submittals		Criteria Data Submittals		HAP Data Submittals		Other Data Submittals*	
	Tribes	Sites	Tribes	Sites	Tribes	Sites	Tribes	Sites
R1	3	2	3	2			1	1
R2	1	1	1	1			1	1
R4	1	3	1	3				
R5	7	7	6	6			5	5
R6	5	12	4	9			5	12
R7**								
R8	4	5	4	5			4	5
R9	23	29	21	26	1	1	14	14
R10	12	15	4	4			11	15
Grand Total:	**56**	**74**	**44**	**56**	**1**	**1**	**41**	**53**

* Submittals for monitored parameters other than Criteria and HAP
** The lack of data for Region 7 is simply due to the fact that no data is being submitted to AQS according to OTS database. Monitoring efforts in the region are being reported through other networks.
Data obtained from OTS database on 3/5/2015; Values reflect monitoring submittals to AQS.

The stagnant or slightly increasing numbers of emissions inventories, TAS, regulations, are more difficult to interpret than the permitting numbers. Many Tribes, for instance, report that they no longer apply for funding because their requests have been unsuccessful on too many occasions. Therefore, although numbers are not decreasing for the aforementioned activities, they are also not increasing as would be expected. With greater funding to support both ongoing air monitoring activities as well as newly established programs, Tribes could contribute even more to air quality protection.

Table 2. National Tribal TAS Summary Report for 2014

EPA Region	Pending Approval	TAS Approved *
	Applications (Tribes)	Applications (Tribes)
1		4 (4)
2		3 (1)
4		1 (1)
5		5 (5)
6	1 (1)	5 (4)
7		2 (2)
8		10 (9)
9		12 (10)
10		14 (13)
Grand Total:	**1 (1)**	**56 (49)**

Note: Applications (Tribes) – the number of applications may be greater than the number of Tribes if a Tribes(s) submits more than one application.
* Decision document signed. Report filter: Active application status.
Data obtained from OTS database on 3/5/2015.

Table 3. National Tribal Permit Summary Report by Permit Type/Category for 2014

Permit Type/Category	Region						Total
	2	5	6	8	9	10	
Permit Grand Total	**1**	**11**	**6**	**132**	**21**	**126**	**297**
NSR: Major - PSD		5		16			21
NSR: Minor - PSD				6		2	8
NSR: Synthetic Minor - PSD				22		7	29
NSR PSD Total		5		44		9	58
NSR: Major - NA							0
NSR: Minor - NA		1					1
NSR: Synthetic Minor - NA							0
NSR Nonattainment Total		1					1
NSR: Minor - HAP							0
NSR: Synthetic Minor - HAP				1			1
NSR HAP Total				1			1
FARR (Region 10): Minor							0
FARR (Region 10): Synthetic Minor						106	106
FARR (Regional 10) Total						106	106
Title V: Major	1	5	6	87	21	11	131
Title V: Minor							0
Title V: Synthetic Minor							0
Title V Total	1	5	6	87	21	11	131

Report Filter: Active Facilities Only.
Data obtained from OTS on 3/5/2015. Includes data entered for all four quarters of 2014.
Note: The table above does not include 15 non-Title V permits issued by Gila River Indian Community.

Table 4. National FY Comparison Report – Number of Tribal Management Projects by Year

Activity	2012	2013	2014	2015[1]
Emission Inventories	118	131	135	137
TAS	51	53	56	57
Regulations	53	54	54	55
Permits	158	159	175	303
Diesel Activities	11	28	15	0**

Data obtained from OTS database on 3/5/2015.
[1]Through Q1 of 2015 - Air Monitoring data is reported at the end of each calendar year.
Information is counted for any of the following types of Tribal air data existing in the OTS database by the end of each FY and the last active quarter of the current FY.
Emission Inventories: Any year complete emission inventory, submitted to the EPA Region, ITEP (QA/QC'ed), and/or NEI and entered into OTS database by the end of each FY
TAS: Any Treatment as State submittal marked as an active submittal and entered into OTS database by the end of each FY.
Regulations: Any regulation submittal, FIP delegation request, or undelegated FIP entered into OTS database by the end of each FY.
Permits: Any type or category of permit for *facilities currently marked as active* entered into OTS database by the end of each FY.
Grants: Number of grants in the OTS database *active at any time during each FY*
Diesel Activities: Number of diesel engines replaced through Diesel Emissions Reduction Act Program Tribal grant projects. Diesel work grants that are shared among Tribes are counted once within a region. This data provided by the Office of Transportation and Air Quality (OTAQ).
** FY 2015 DERA Tribal Program Request for Proposals will open in May 2015. Grants are expected to be awarded in late summer/early fall of 2015.
Note: The table above does not include 15 non-Title V permits issued by Gila River Indian Community.

Table 5. National Tribal Grant Summary Report for FY2014

EPA Region	Grant Types											Region Total
	103 (XA/TX)	105 (A)	105PPA (BG)	CARE Level 1	CARE Level 2	DITCA	GAP	Local Showcase	Radon*	TSCA 10	Unknown	
	Grants (Tribes)	Grants (Tribes)	Grants (Tribes)	Grants (Tribes)	Grants (Tribes)	Grants (Tribes)	Grants (Tribes)	Grants (Tribes)	Grants (Tribes)	Grants (Tribes)	Grants (Tribes)	Grants (Tribes)
1	33 (8)	4 (2)	2 (1)			1 (1)					1 (1)	41 (8)
2	3 (2)		2 (1)									5 (2)
4	5 (3)	5 (1)										10 (3)
5	106 (20)	11 (3)	3 (3)			2 (1)						122 (20)
6	70 (28)			1 (1)				1 (1)				72 (28)
7	40 (7)		2 (1)									42 (7)
8	75 (13)	38 (7)	15 (5)	3 (3)				1 (1)			2 (2)	134 (16)
9	182 (31)	22 (4)		2 (1)				2 (2)				208 (36)
10	25 (14)	32 (11)	4 (2)	1 (1)	1 (1)	6 (3)	3 (2)	3 (3)				75 (26)
Grand Total:	**539 (126)**	**112 (28)**	**28 (13)**	**7 (6)**	**1 (1)**	**9 (5)**	**3 (2)**	**7 (7)**	**0 (0)**	**0 (0)**	**3 (3)**	**709 (146)**

Data obtained from OTS on 3/5/2015.

Note: Grants (Tribes) - The number of grants may be greater than the number of Tribes if a Tribe(s) within a region receives more than one grant.

103 XA/TX = CAA Section 103 indoor air

105 (A) = Air pollution control

105 PPA (BG) = Performance partnership agreement

CARE Levels 1 & 2 = Community Action for a Renewed Environment

DITCA = Direct Implementation Tribal Cooperative Agreements

Local Showcase = Climate showcase projects

TSCA 10 = Toxic Substances Control Act

Unknown = Schools-based IAQ assessments

* The number of radon grants reported within OTS and displayed in the table above does not coincide with reporting by the regions.

Conclusion

The NTAA wishes to thank its partners and colleagues who work in collaboration with Tribes to protect air quality throughout the nation. Within Indian Country there lies a tremendous amount of potential and great talent that can contribute to regional and national air quality management efforts. In order to participate in these activities, Tribal air programs, much like their state and local counterparts, must receive adequate funding and technical training and support. NTAA will continue to work with EPA and state entities to advance air quality management and advocate for Tribal sovereignty through environmental management.

References

Federal Register. 2014. Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units. Accessed at: https://www.federalregister.gov/articles/2014/06/18/2014-13726/carbon-pollution-emission-guidelines-for-existing-stationary-sources-electric-utility-generating

Federal Register. 2014. Data Requirements Rule for the 1-Hour Sulfur Dioxide (SO_2). Accessed at: https://www.federalregister.gov/articles/2014/05/13/2014-09458/data-requirements-rule-for-the-1-hour-sulfur-dioxide-so2

Federal Register. 2014. General Permits and Permits by Rule for the Federal Minor New Source Review Program in Indian Country. Accessed at: https://www.federalregister.gov/articles/2014/07/17/2014-16814/general-permits-and-permits-by-rule-for-the-federal-minor-new-source-review-program-in-indian

Federal Register. 2014. Revisions to National Emission Standards for Radon Emissions From Operating Mill Tailings. Accessed at: https://www.federalregister.gov/articles/2014/05/02/2014-09728/revisions-to-national-emission-standards-for-radon-emissions-from-operating-mill-tailings

Office of Management and Budget (OMB). 2015. Fiscal Year 2015 Budget of the U.S. Government. Accessed at https://www.whitehouse.gov/sites/default/files/omb/budget/fy2015/assets/budget.pdf.

US Environmental Protection Agency (USEPA). 2014. American Indian Environmental Office Tribal Portal, Indian Policies. Accessed at: http://www.epa.gov/tribalportal/basicinfo/presidential-docs.html

US Environmental Protection Agency (USEPA). 2014. Memorandum: U.S. Environmental Protection Agency's "Policy on Environmental Justice for Working with Federally Recognized Tribes and Indigenous Peoples". Accessed at: http://www.epa.gov/environmentaljustice/resources/policy/indigenous/ej-indigenous-policy.pdf

US Environmental Protection Agency (USEPA). 2013. Questions About Your Community: Indoor Air. Accessed at http://www.epa.gov/region1/communities/indoorair.html.

Appendix A. NTAA Air Quality Budget Analysis

NTAA FY2017 Tribal Air Quality Budget Analysis

May 2015

National Tribal Air Association

The National Tribal Air Association (NTAA) was founded in 2002 through a grant from the US Environmental Protection Agency's Office of Air and Radiation.

Mission

The mission of the NTAA is to advance air quality management policies and programs, consistent with the needs, interests, and unique legal status of American Indian Tribes and Alaska Natives.

Goals

1. Advocate for and advance tribal environmental, cultural, and economic interests in the development of air policy at all levels of government (tribal, local, state, regional, federal, and international).

2. Promote the development, funding, and capacity building of tribal air management programs.

3. Promote and facilitate air quality policy and technical information that may include research and scientific and medical studies.

4. Advance the recognition and acceptance of tribal sovereign authority by conducting effective communication and outreach to local, state, federal, and international agencies, as well as the general public.

5. Encourage and support appropriate consultation with all tribal governments in accordance with Tribal structures and policies.

The NTAA is a Tribal member organization with 94 principal member Tribes. The organization serves as a resource to all 566[16] federally recognized Tribal Nations. The NTAA's mission is to advance air quality management policies and programs, consistent with the needs, interests, and unique legal status of Tribes. As such, the NTAA uses its resources to support the efforts of all federally recognized Tribes in protecting and improving the air quality within their respective jurisdictions. Although the NTAA always seeks to represent consensus perspectives on any given issue, it is important to note that all Tribes may not agree upon its expressed views. Further, it is important that EPA understands interactions with the NTAA do not substitute for government-to-government consultation, which can be achieved only through direct communication between the federal government and the Tribes.

[16] Federal Register/Vol. 79, No.19/Wednesday, January 29, 2014/Notices http://www.bia.gov/cs/groups/public/documents/text/idc006989.pdf

FY2017 Tribal Air Quality Budget Analysis

Introduction

The National Tribal Air Association (NTAA), utilizing Tribal input, EPA documents, and Executive Committee member experience, has developed a snapshot of air quality funding gaps in Indian Country. NTAA believes that by increasing funding to close identified gaps in Indian Country, EPA will effectively strengthen its government-to-government relationships and demonstrate a clear commitment to supporting Tribes as they endeavor to meet their respective environmental and human health protection goals.

This report is a snapshot of air quality programmatic and funding issues in Indian Country. The report includes or reflects information contained in the following documents:

1. FY 2011-2015 EPA Strategic Plan *Cross-Cutting Fundamental Strategy: Strengthening State, Tribal and International Partnerships*
2. OAQPS National Tribal List Report 4/20/2014
3. OAQPS Tribal Air Quality Management Report January 2013/2014

The report identifies three major areas for improvement of air quality in Indian Country by (1) identifying Tribal air program capacity gaps and air data gaps within Indian Country; (2) identifying a budget request that will enable federal agencies to begin addressing these gaps; and (3) to address funding for technical and policy programs that support Tribal air quality program development (e.g. NSR, climate change adaptation planning).

Current FY 2014 Funding

Regions have reported that virtually all well written, substantive Tribal air program funding requests are funded on an annual basis[17]. While this may be true, the trend actually obfuscates the underlying issue, which is that having been denied multiple times over in the past, many Tribes have ceased applying for funding. Similarly, some Tribes do not pursue funding at all because they are aware that EPA funding, and consequently STAG funding, have been stagnant if not decreasing over time. Fundamentally, Tribes require equitable and guaranteed funding for new and existing air programs, which is not presently reflected in practice.

As Tribes have stated in the past, "If we have to be recognized as states then fund us as states." In the National Congress of American Indians FY2016 Indian Country Budget Request this theme also prevailed; "…NCAI requests that EPA tribal programs receive at a minimum, sufficient resources to achieve parity with states through sustainable targeted base funding."[18]

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[17] According to a recent query, NTAA learned that most regions fund approximately 100% of Tribal air funding requests.

[18] NCAI FY2016 Indian Country Budget Request: Promoting Self-Determination, Modernizing the Trust Relationship -Environmental Protection http://www.ncai.org/policy-issues/tribal-governance/budget-and-approprations/12_FY2016_Environ_NCAI_Budget.pdf

It is unclear how many Tribes have given up on applying for air grants because they anticipate that there are insufficient funds to support all interested Tribal air staff/programs. In many instances, Tribes have only one staff person designated to work across all environmental media. The Tribes cannot afford to allocate time toward completing an air quality grant if the process continually renders no results in the way of additional funding for air activities.

Furthermore, some EPA regions do not report funding and grant numbers to the national database leaving organizations like the NTAA with a lack of clarity about unmet needs. Without actually knowing how many Tribes want or request air funding, there is no way to develop an accurate budget request that is truly reflective of Tribal needs. To be able to develop an accurate budget, the NTAA needs to have as much information as possible (e.g. How many Tribes want or have requested air grants? What specific activities do Tribes plan to support using the requested funds? How much total funding are the Tribes requesting?).

At the moment, NTAA does not have access to the aforementioned information. There is, however, summary data from annual STAG allocations (see Table 1 below).

Table 1 Regional STAG Allocation for fiscal years 2012-2015.

Region	2012 STAG	2013 STAG	2014 STAG	2015 STAG
1	$551,903	$513,927	$521,147	$518,694
2	$440,175	$327,840	$329,646	$418,623
4	$329,424	$308,096	$314,409	$301,579
5	$1,261,468	$1,154,322	$1,187,351	$1,234,260
6	$1,290,221	$1,178,038	$1,171,513	$1,176,236
7	$465,216	$451,078	$502,756	$526,581
8	$1,967,388	$1,904,267	$1,998,953	$1,956,809
9	$3,259,737	$2,959,350	$2,921,915	$2,868,663
10 (incl. Alaska)	$2,648,791	$2,432,197	$2,483,379	$2,459,831
Total:	$12,214,323	$11,229,115	$11,431,069	$11,461,276

From this Table it is clear that funding has changed little over the last few years, yet the demand has not been met and is ever increasing.

Analysis for Future Funding

Currently, EPA funding for Tribal Air Programs does not meet the needs of Tribes who seek to address serious air quality issues within their communities. The EPA's annual budget for Tribal air quality activities has not increased over the years despite an ever-growing demand for new program capacity development, and advanced monitoring and regulatory development among Tribes with existing programs.

While not all Tribes wish to have an air program or an air-monitoring program, Tribes that do want to manage their air resources should have the opportunity to receive funding so that they can host such programs. Every Tribe has the right to know if their air is healthy. Tribes who receive funding need to know that they will retain their funding and that their programs will be able to grow and mature, without being abruptly cut-off or terminated.

The NTAA encourages the EPA to remember when it decides to implement a new regulation or to change a policy that one of the first considerations needs to be feasibility - how the work will be accomplished? Also, are Tribes being included in the decision-making process? And is there sufficient funding to support Tribal participation?

The NTAA asks that EPA and other appropriators consider increasing Tribal air program funding in keeping with their trust responsibility. Further NTAA strongly believes that increased funding will begin to fill data gaps and provide valuable information on a regional and national level.

The NTAA strongly suggests to the EPA that it is prudent to increase Tribal Air Program funding by a minimum of $7 million and regulatory and policy change implementation by a minimum of $8 million over the next five years. This funding request is made in addition to current funding and is requested to NOT be at the detriment or withdrawn from any other programs fiscal support.

- ***$1.5 million to give a few additional Tribes the ability to begin new air programs and build capacity while allowing for current and mature Tribal Air Programs to continue***. This allocation would begin to fulfill EPA's strategic plan. Funding utilized by Tribes is a sound investment; this statement is based upon the efficiency of each air program that currently operates in Indian Country. Additionally, many Tribes that have established programs are not able to implement more advanced monitoring and/or to develop regulatory programs to address air pollution sources at their current funding levels. New and existing Tribal air programs are in desperate need of additional EPA funding and support in order to monitor and regulate their air shed(s) in order to protect the health and welfare of Tribal Members.
- ***$1 million for climate adaptation planning*** to prepare for the impacts of climate change and/or reducing greenhouse gas emissions. Tribes have contributed little to the causes of climate change, but have been disproportionately affected by the risks. The impacts of climate change threaten the life ways, subsistence, land rights, future growth, culture, resources, and sustainability. Only a few Tribes have begun their adaptation planning, but many more will need to start. At this time there is no funding allocated for this purpose and is needed and necessary.
- ***$1 million for indoor air and radon programs***. In the past these programs have been minimally funded or considered unfunded mandates. Recently, the funding made available for the Radon Program was removed. These programs are extremely

important for Tribes and their community's health. It is time for these programs to be funded and supported by the EPA in an appropriate manner.

- ***$1 million for Tribal participation in Regional Planning Organizations (RPOs)***. RPOs have been activated, however funding for tribal participation has not been allocated. Without funding for travel, technical support, and staff participation the concept of Tribes and states having the opportunity to plan together on equal ground will not be possible. Therefore, it is imperative that Tribes have assistance with funding to be available to participate fully at the table with states.
- ***$2.5 million for Renewable Energy Efficiency Plans under the Clean Power Plan Rule*** for travel and staff time to meet with the states, and to develop plans, technical support and develop implementation.
- ***$8 million for the NSR Program over the next 5 years***. The cost of regulatory and policy changes and implementation to Tribes. While in many cases it is not necessary for Tribes to take on the delegated authority of implementing a program through a TIP, Tribes are opting to take a more active role in the implementation and delegative authority process. This assists the EPA with permitting in a timely manner and the burden of enforcement.

If you have any questions or comments about this document or the NTAA please contact us.

Respectfully Submitted,

Bill Thompson
NTAA Chairperson and Vice Chief of the Penobscot Nation
Bill.Thompson@penobscotnation.org

Appendix B. NTAA Activities in 2014

National Tribal Air Association (NTAA) Activities in 2014

NTAA Policy Analysis and Outreach Efforts
The following is an overview of NTAA's policy and engagement activities for 2014.

Policy Advisory Committee
This year NTAA expanded its capacity for issues analysis through the creation of a Policy Advisory Committee (PAC) comprised of highly experienced attorneys and policy analysts. These subject experts are helping to advance the policy analysis and engagement capacity of the organization. Background information on the PAC members can be found on the NTAA website.

White Papers
NTAA provides white papers on important policy issues that may impact Tribes. For example, NTAA's most recent White Paper explored recent legal decisions in Wyoming and Oklahoma that will impact Tribes' ability to improve and regulate air quality. This paper was authored by a PAC member and was featured during the 2014 National Tribal Forum on Air Quality.

Policy Response Kits
NTAA's primary work includes policy analysis for Tribes to better understand important air quality policy, rules and guidance's originating from the EPA. In 2014, the NTAA produced eight Policy Response Kits (PRKs). NTAA PRKs are posted online and delivered to NTAA member Tribes to help in analyzing proposed air quality rules that are open for public comment. PRKs include fact sheets, NTAA official comments and template letters that Tribes can use to submit their own comments.

NTAA submitted comments and produced a PRK for each of the following rules:

- EPA's Clean Power Plan also commonly known as, "the Carbon Rule or the 111(d) rule." As part of the Clean Air Act, EPA is authorized to regulate CO_2 pollution from existing plants in order to meet the goal of reducing CO_2 emissions 30% by 2030. NTAA submitted comments on this rule and produced a policy response kit for tribal partners. As part of the PRK, NTAA hosted a 3-part webinar series discussing EPA's Clean Power Plan. The webinar series can be viewed on NTAA's website. Comments were also prepared for EPA's Supplemental Proposal for power plants located on Tribal lands. *Published in the FR on June 18, 2014; EPA-HQ-OAR-2013-0602.*

- EPA's Revisions to National Emission Standards for Radon Emissions From Operating Mill Tailings: *Published in the FR on May 2, 2014; EPA–HQ–OAR–2008–0218; FRL–9816–2.*

- Grants.gov Issue: NTAA staff drafted and submitted comments on this issue.

- Data Requirements Rule for the 1-Hour Sulfur Dioxide (SO_2) Primary National Ambient Air Quality Standard (NAAQS): *Published in the FR on May 14, 2014; EPA-HQ-OAR-2013-0711.*

- Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces, and New Residential Masonry Heaters: *Published in the FR on February 3, 2014; EPA-HQ-OAR-2009-0734.*

- General Permits and Permits by Rule for the Federal Minor New Source Review Program in Indian Country: *Published in the FR on July 17, 2014; EPA-HQ-OAR-2011-0151.*

- USEPA's Policy on Environmental Justice for Working with Federally Recognized Tribes and Indigenous Peoples: *Published on July 24, 2014.*

- National Ambient Air Quality Standards for Ozone: *Published in the FR on December 17, 2014. EPA–HQ–OAR–2008–0699; FRL–9918–43– OAR.*

- FY 2016-2017 National Program Manager (NPM) Guidances: *Released for comment on February 23, 2015.*

The NTAA is busy preparing Policy Response Kits for several current and forthcoming EPA actions, including the following:

- The Nuclear Regulatory Commission (NRC) is crafting a new Tribal Policy Statement to ensure effective government-to-government interactions with American Indian and Alaska Native Tribes. Comments are due June 1st.

- NTAA is tracking USEPA actions to regulate methane emissions from oil and gas operations and plans to submit comments to EPA on the issue.

- EPA is preparing work on Regional Haze and NTAA EC members have been asked to provide feedback on ensuring Tribal participation in Regional Planning Organizations to address regional haze. NTAA will mostly likely be preparing comments when EPA proposes an action.

- OAR will provide responses to public comment when the final OAR NPM Guidance for FY 2016-2017 is issued in April 2015. NTAA has submitted comments on the draft guidance document.

All of NTAA's policy work, including PRKs, can be found on NTAA's website at www.ntaatribalair.org

Other NTAA Policy Resources for Tribes
In addition to the publication of policy response kits and submission of comment letters regarding federal actions, NTAA also engages in outreach efforts to Tribes through the following activities:

Monthly NTAA/USEPA Policy Calls
These calls are held on a monthly basis and are open to the public. Calls generally consist of presentations by EPA staff on forthcoming actions and activities, followed by updates from the national tribal contacts within the Office of Air and Radiation, including staff from the Office of Atmospheric Programs, the Office of Radiation and Indoor Air, the Office of Transportation and Air Quality, and the Office of Air Quality Planning and

Standards. NTAA also provides a brief update of recent activities (e.g. comment letters submitted in response to proposed federal actions, upcoming webinars, etc.).

Weekly Update/Newsletter
NTAA is an important conduit of information for Tribal air programs and provides information on a weekly basis through a weekly update that offers links to the latest air quality and climate change news articles, events, resources, and grant opportunities for Tribes.

Status of Tribal Air Report
The Status of Tribal Air Report (STAR) is an annual publication that provides a national snapshot of Tribal Air programs and tells the story of Tribes improving indoor and ambient air quality as well as combating and adapting to climate change. The STAR specifically informs and educates important decision-makers on funding needs for Tribal Air Programs and provides recommendations to ensure Tribes have the tools and resources they need to get the job done. The STAR is typically reviewed and edited by PAC members, EC members, and Member Tribes.

National Tribal Forum (NTF) on Air Quality
Each year, NTAA cosponsors the National Tribal Forum on Air Quality. The 16th annual National Tribal Forum on Air Quality provides environmental professionals from Tribes, EPA, and other organizations an opportunity to meet and discuss current policies, regulatory initiatives, funding, and technical topics in air quality.

Effective Partnerships
Over the past several months, the NTAA has reached out to groups with related air quality responsibilities and is beginning to work collaboratively with several of these groups including the National Tribal Caucus (NTC), Clean Air Act Advisory Committee (CAAAC), the Tribal Air Monitoring Support Center (TAMS Center), Air &Waste Management Association (AWMA), and Intertribal Consortia Groups such as the Inter Tribal Council of Arizona (ITCA).

Appendix C. NTAA Member Tribe Roster

Region 1 (2 Tribes)
- Houlton Band of Maliseet Indians
- Penobscot Indian Nation

Region 2 (2 Tribes)
- Seneca Nation of Indians
- Saint Regis Band of Mohawk Indians

Region 4 (4 Tribes)
- Catawba Indian Nation
- Eastern Band of Cherokee
- Miccosukee Indian Tribe of Florida
- Poarch Band of Creek Indians

Region 5 (17 Tribes)
- Bad River Band of Lake Superior Tribe of Chippewa Indians
- Bois Forte Band of Chippewa
- Fond du Lac Band of Lake Superior Chippewa
- Forest County Potawatomi Community
- Grand Portage Band of Lake Superior Chippewa
- Grand Traverse Band of Ottawa & Chippewa Indians
- Lac du Flambeau Band of Lake Superior Chippewa Indians
- Leech Lake Band of Ojibwe
- Little Traverse Bay Bands of Odawa Indians
- Lower Sioux Indian Community
- Match-E-Be-Nash-She-Wish Band of Pottawatomi Indians of Michigan
- Menominee Indian Tribe of Wisconsin
- Oneida Tribe of Indians of Wisconsin
- Red Lake Band of Chippewa Indians
- Saginaw Chippewa Indian Tribe of Michigan
- St. Croix Chippewa Indian of Wisconsin
- White Earth Nation

Region 6 (14 Tribes)
- Cherokee Nation of Oklahoma
- Citizen Potawatomi Nation
- Delaware Nation of Oklahoma
- Fort Sill Apache Tribe of Oklahoma
- Iowa Tribe of Oklahoma
- Modoc Tribe of Oklahoma
- Ohkay Owingeh
- Pueblo of Acoma

- Pueblo of Jemez
- Pueblo of Laguna
- Pueblo of Santo Domingo
- Quapaw Tribe Of Oklahoma
- Sac and Fox Nation
- Seminole Nation of Oklahoma

Region 7 (7 Tribes)
- Kickapoo Tribe in Kansas
- Ponca Tribe of Nebraska
- Prairie Band Potawatomi Nation
- Sac & Fox Tribe of the Mississippi in Iowa/Meskwaki
- Sac & Fox Nation of Missouri in Kansas and Nebraska
- Santee Sioux Nation
- Winnebago Tribe of Nebraska

Region 8 (6 Tribes)
- Confederated Salish & Kootenai Tribes
- Fort Belknap Indian Community
- Fort Peck Tribes of Assiniboine & Sioux Tribe
- Northern Cheyenne Tribe
- Northwestern Band of Shoshone Nation
- Southern Ute Indian Tribe

Region 9 (17 Tribes)
- Bishop Paiute Tribe
- Blue Lake Rancheria
- Colorado River Indian Tribes
- Cortina Indian Rancheria of Wintun Indians
- Gila River Indian Community
- Hualapai Tribe
- Lone Pine Paiute Shoshone Reservation
- Manzanita Band of the Kumeyaay Nation
- Moapa Band of Paiutes
- Morongo Band of Mission Indians
- Pechanga Band of Luiseno Indians
- Pyramid Lake Paiute Tribe
- Robinson Rancheria of Pomo Indians
- Soboba Band of Luiseno Indians
- Susanville Indian Rancheria
- Washoe Tribe of Nevada and California
- White Mountain Apache Tribe

Region 10 (10 Tribes)
- Coeur d'Alene Tribe
- Confederated Tribes of Warm Springs
- Confederated Tribes of the Colville Reservation
- Confederated Tribes of the Coos, Lower Umpqua & Siuslaw Indians

- Kootenai Tribe of Idaho
- Makah Indian Tribe
- Nez Perce Tribe
- Quinault Indian Nation
- Spokane Tribe
- Yakama Nation

Alaska (15 Tribes and Villages)

- Aleknagik Traditional Council
- Bristol Bay Native Association
- Chickaloon Village Traditional Council
- Inupiat Community of the Arctic Slope
- Native Village of Buckland
- Native Village of Kivalina (IRA)
- Native Village of Kwinhagak
- Native Village of Noatak
- Native Village of Old Harbor
- Native Village of Selavik
- Native Village of Selawick
- Native Village of Shungnak
- Noorvik Native Community
- Orutsararmuit Native Council
- Seldovia Village Tribe

Tribal Consortia as Associate NTAA members

- Inter-Tribal Council of Arizona

Appendix D. Tribal Air Monitoring Sites & AQS Data Submission (2000-2014)

EPA Region	Number of Tribes Submitting Data to AQS														
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
1	-	-	1	1	2	2	4	4	4	4	4	3	4	4	3
2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
4	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
5	1	4	5	7	7	7	9	9	9	9	9	9	9	7	7
6	8	8	7	10	9	8	9	9	6	5	6	5	6	6	5
7**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	7	7	7	8	10	10	8	8	6	6	6	6	5	7	4
9	2	2	5	6	8	11	15	18	21	22	21	23	25	27	23
10	4	3	5	7	8	8	13	15	18	16	16	18	15	14	12
Grand Total:	**24**	**26**	**32**	**41**	**46**	**48**	**60**	**65**	**66**	**64**	**64**	**66**	**66**	**67**	**56**

EPA Region	Number of Tribal Monitoring Sites														
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
1			1	1	2	2	3	3	3	3	3	3	3	3	2
2	2	3	3	3	3	1	1	1	1	1	1	1	1	1	1
4	2	2	2	2	2	2	2	2	1	2	2	2	3	3	3
5	1	5	7	8	8	8	10	10	10	11	11	10	10	7	7
6	8	8	10	13	15	13	12	15	11	9	14	11	12	12	12
7**															
8	18	18	19	18	19	14	14	13	10	11	14	11	7	10	5
9	3	3	7	8	9	17	23	26	29	32	33	34	35	34	29
10	6	7	10	13	10	10	18	18	20	18	18	19	19	18	15
Grand Total:	**40**	**46**	**59**	**66**	**68**	**67**	**83**	**88**	**85**	**87**	**96**	**91**	**90**	**88**	**74**

Report Filter: All Monitored Parameters; Last AQS Retrieval Date: 01/05/2015; Data accurate as of 3/4/2015

** The lack of data for Region 7 is simply due to the fact that no data is being submitted to AQS according to OTS database. Monitoring efforts in the region are being reported through other networks.

Appendix E. Organizational Charts for OAR and OITA

Office of Policy Analysis and Review

Office of Air and Radiation (OAR) Assistant Administrator and Deputy Assistant Administrator

202-564-7404

About OAR

Office of Program Management Operations

Office of Air Quality Planning and Standards (OAQPS)

919-541-5616

About OAQPS

- Policy Analysis and Communications Staff
- Central Operations and Resources
- Air Quality Assessment Division
- Air Quality Policy Division
- Health and Environmental Impacts Division
- Outreach and Information Division
- Sector Policies and Programs Division
- Washington Operations Staff

Office of Atmospheric Programs (OAP)

202-343-9140

About OAP

- Clean Air Markets Division
- Climate Protection Partnership Division
- Stratospheric Protection Division
- Climate Change Division

Office of Transportation and Air Quality (OTAQ)

202-566-0495

About OTAQ

- Assessment and Standards Division
- Compliance Division
- Transportation and Climate Division
- Testing and Advanced Technology Division

Office of Radiation and Indoor Air (ORIA)

202-343-9320

About ORIA

- Program Management Office
- Indoor Environments Division
- Radiation Protection Division
- Radiation and Indoor Environments National Laboratory
- National Analytical Radiation Environmental Laboratory

Office of International and Tribal Affairs (OITA) Assistant Administrator and Deputy Assistant Administrator

202-564-6600

About OITA

Office of Regional and Bilateral Affairs (ORBA)

202-564-6400

About ORBA

- North America Program
- Latin America / Caribbean Program
- Asia-Pacific Program
- Eurasia, Africa, Middle East Program

Office of Global Affairs and Policy (OGAP)

202-564-6455

About OGAP

- International Organizations Program
- Trade and Economics Program
- Climate and Energy Program
- Environmental Media Program

Office of Management and International Services (OMIS)

202-564-6605

About OMIS

- Budget and Resources Management Program
- Administrative Management Program
- International Services Program

American Indian Environmental Office (AIEO)

202-564-0303

About AIEO

- Law and Policy Program
- Outreach and Partnerships Program
- Grants Technical Assistance Program

Appendix F. National List of Nonattainment or Maintenance Areas Containing Tribal Lands

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Region 1					
Aroostook Band of Micmacs (previously listed as the Aroostook Band of Micmac Indians) (tribal code 031)	PM-10 (1990)	Aroostock County; City of Presque Isle	Maintenance	Moderate	1
Mashantucket Pequot Indian Tribe (previously listed as the Mashantucket Pequot Tribe of Connecticut) (tribal code 020)	8-hour Ozone (1997)	Greater Connecticut Area	Nonattainment	Subpart 2/Moderate	1
Mashpee Wampanoag Tribe (previously listed as the Mashpee Wampanoag Indian Tribal Council, Inc.) (tribal code TBD)	8-hour Ozone (1997)	Boston-Lawrence-Worcester (E. Mass) Area	Nonattainment	Subpart 2/Moderate	1
Mohegan Indian Tribe of Connecticut (tribal code 033)	8-hour Ozone (1997)	Greater Connecticut Area	Nonattainment	Subpart 2/Moderate	1
Narragansett Indian Tribe (tribal code 027)	8-hour Ozone (1997)	Providence (all of RI) Area	Nonattainment	Subpart 2/Moderate	1
Penobscot Nation (previously listed as the Penobscot Tribe of Maine) (tribal code 018)	Sulfur Dioxide (1978)	AQCR 109-Millinocket	Maintenance		1
Wampanoag Tribe of Gay Head (Aquinnah) (tribal code 030)	8-hour Ozone (1997)	Boston-Lawrence-Worcester (E. Mass) Area	Nonattainment	Subpart 2/Moderate	1
Region 2					
Onondaga Nation (tribal code 006)	Carbon Monoxide (1990)	Syracuse Area; Onondaga County	Maintenance	Moderate <= 12.7ppm	1
Seneca Nation of Indians (previously listed as the Seneca Nation of New York) (tribal code 012)	8-hour Ozone (1997)	Buffalo-Niagara Falls	Nonattainment	Subpart 2/Moderate	1

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Tonawanda Band of Seneca (previously listed as the Tonawanda Band of Seneca Indians of New York) (tribal code 008)	8-hour Ozone (1997)	Buffalo-Niagara Falls	Nonattainment	Subpart 2/Moderate	1
Tonawanda Band of Seneca (previously listed as the Tonawanda Band of Seneca Indians of New York) (tribal code 008)	8-hour Ozone (1997)	Rochester	Nonattainment	Subpart 2/Marginal	1
Tuscarora Nation (tribal code 009)	8-hour Ozone (1997)	Buffalo-Niagara Falls	Nonattainment	Subpart 2/Moderate	1
Region 4					
Catawba Indian Nation (aka Catawba Tribe of South Carolina) (tribal code 032)	8-hour Ozone (1997)	Charlotte-Gastonia-Rock Hill Area	Maintenance	Subpart 2/Moderate	1
Eastern Band of Cherokee Indians (tribal code 001)	8-hour Ozone (1997)	Haywood and Swain Counties (Great Smoky NP) Area	Maintenance	Former Subpart 1	1
Region 5					
Lac du Flambeau Band of Lake Superior Chippewa Indians of the Lac du Flambeau Reservation of Wisconsin (tribal code 432)	Sulfur Dioxide (1978)	AQCR 238: Oneida County: Rhinelander Sub-city area	Maintenance		3
Match-e-be-nash-she-wish Band of Pottawatomi Indians of Michigan (tribal code 484)	8-hour Ozone (1997)	Detroit-Ann Arbor Area	Maintenance	Subpart 2/Marginal	1.5
Match-e-be-nash-she-wish Band of Pottawatomi Indians of Michigan (tribal code 484)	PM-2.5 (2006)	Detroit-Ann Arbor	Maintenance	Former Subpart 1	1.5
Match-e-be-nash-she-wish Band of Pottawatomi Indians of Michigan (tribal code 484)	PM-2.5 (1997)	Detroit-Ann Arbor	Maintenance	Former Subpart 1	2

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Nottawaseppi Huron Band of the Potawatomi, Michigan (previously listed as the Huron Potawatomi, Inc.) (tribal code 481)	8-hour Ozone (1997)	Kalamazoo-Battle Creek Area	Maintenance	Former Subpart 1	1
Pokagon Band of Potawatomi Indians, Michigan and Indiana (tribal code 480)	8-hour Ozone (1997)	Cass County Area	Maintenance	Subpart 2/Marginal	1.5
Region 6					
Jicarilla Apache Nation, New Mexico (tribal code 701)	PM-10 (1990)	Archuleta County; Pagosa Springs	Maintenance	Moderate	1
Pueblo of Isleta, New Mexico (tribal code 705)	Carbon Monoxide (1990)	Albuquerque Area	Maintenance	Moderate <= 12.7ppm	1
Pueblo of Laguna, New Mexico (tribal code 707)	Carbon Monoxide (1990)	Albuquerque Area	Maintenance	Moderate <= 12.7ppm	1
Pueblo of Sandia, New Mexico (tribal code 711)	Carbon Monoxide (1990)	Albuquerque Area	Maintenance	Moderate <= 12.7ppm	1
Ysleta Del Sur Pueblo of Texas (tribal code 725)	PM-10 (1990)	El Paso County	Nonattainment	Moderate	1
Region 8					
Confederated Salish and Kootenai Tribes of the Flathead Reservation (tribal code 203)	PM-10 (1990)	Lake County; Polson	Nonattainment	Moderate	1
Confederated Salish and Kootenai Tribes of the Flathead Reservation (tribal code 203)	PM-10 (1990)	Lake County; Ronan	Nonattainment	Moderate	1
Northern Cheyenne Tribe of the Northern Cheyenne Indian Reservation, Montana (tribal code 207)	PM-10 (1990)	Rosebud County; Lame Deer	Nonattainment	Moderate	1

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Ute Indian Tribe of the Uintah & Ouray Reservation, Utah (tribal code 687)	PM-10 (1990)	Utah County	Nonattainment	Moderate	1
Region 9					
		Area Name			
Agua Caliente Band of Cahuilla Indians of the Agua Caliente Indian Reservation, California (tribal code 584)	8-hour Ozone (1997)	Riverside County (Coachella Valley) Area	Nonattainment	Subpart 2/Severe 15	1
Agua Caliente Band of Cahuilla Indians of the Agua Caliente Indian Reservation, California (tribal code 584)	PM-10 (1990)	Riverside, Los Angeles, Orange, and San Bernardino Counties; South Coast Air Basin	Maintenance	Serious	3
Agua Caliente Band of Cahuilla Indians of the Agua Caliente Indian Reservation, California (tribal code 584)	PM-10 (1990)	Riverside County; Coachella Valley planning area	Nonattainment	Serious	3
Agua Caliente Band of Cahuilla Indians of the Agua Caliente Indian Reservation, California (tribal code 584)	Carbon Monoxide (1990)	Los Angeles-South Coast Air Basin Area	Maintenance	Serious	3
Augustine Band of Cahuilla Indians, California (previously listed as the Augustine Band of Cahuilla Mission Indians of the Augustine Reservation) (tribal code 567)	8-hour Ozone (1997)	Riverside County (Coachella Valley) Area	Nonattainment	Subpart 2/Severe 15	1
Augustine Band of Cahuilla Indians, California (previously listed as the Augustine Band of Cahuilla Mission Indians of the Augustine Reservation) (tribal code 567)	PM-10 (1990)	Riverside County; Coachella Valley planning area	Nonattainment	Serious	3
Berry Creek Rancheria of Maidu Indians of California (tribal code 504)	8-hour Ozone (1997)	Chico	Nonattainment	Subpart 2/Marginal	2

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Big Sandy Rancheria of Western Mono Indians of California (previously listed as the Big Sandy Rancheria of Mono Indians of California) (tribal code 506)	8-hour Ozone (1997)	San Joaquin Valley Area	Nonattainment	Subpart 2/Extreme	1
Big Sandy Rancheria of Western Mono Indians of California (previously listed as the Big Sandy Rancheria of Mono Indians of California) (tribal code 506)	PM-2.5 (2006)	San Joaquin Valley	Nonattainment	Moderate	2
Big Sandy Rancheria of Western Mono Indians of California (previously listed as the Big Sandy Rancheria of Mono Indians of California) (tribal code 506)	PM-2.5 (1997)	San Joaquin Valley	Nonattainment	Moderate	2
Big Sandy Rancheria of Western Mono Indians of California (previously listed as the Big Sandy Rancheria of Mono Indians of California) (tribal code 506)	PM-10 (1990)	San Joaquin Valley Air Basin; Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus, Tulare Counties	Maintenance	Serious	3
Buena Vista Rancheria of Me-Wuk Indians of California (tribal code 508)	8-hour Ozone (1997)	Amador and Calaveras Cos. (Central Mountain Cos.)	Nonattainment	Subpart 2/Moderate	2
Cabazon Band of Mission Indians, California (tribal code 568)	8-hour Ozone (1997)	Riverside County (Coachella Valley) Area	Nonattainment	Subpart 2/Severe 15	1
Cabazon Band of Mission Indians, California (tribal code 568)	PM-10 (1990)	Riverside County; Coachella Valley planning area	Nonattainment	Serious	3
Cahuilla Band of Mission Indians of the Cahuilla Reservation, California (tribal code	8-hour Ozone (1997)	Los Angeles-South Coast Air Basin Area	Nonattainment	Subpart 2/Extreme	1

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
569)					
Cahuilla Band of Mission Indians of the Cahuilla Reservation, California (tribal code 569)	PM-2.5 (2006)	Los Angeles-South Coast Air Basin	Nonattainment	Moderate	2
Cahuilla Band of Mission Indians of the Cahuilla Reservation, California (tribal code 569)	PM-2.5 (1997)	Los Angeles-South Coast Air Basin	Nonattainment	Moderate	2
Cahuilla Band of Mission Indians of the Cahuilla Reservation, California (tribal code 569)	PM-10 (1990)	Riverside, Los Angeles, Orange, and San Bernardino Counties; South Coast Air Basin	Maintenance	Serious	3
Cahuilla Band of Mission Indians of the Cahuilla Reservation, California (tribal code 569)	Carbon Monoxide (1990)	Los Angeles-South Coast Air Basin Area	Maintenance	Serious	3
California Valley Miwok Tribe, California (tribal code 628)	8-hour Ozone (1997)	Amador and Calaveras Cos. (Central Mountain Cos.)	Nonattainment	Subpart 2/Moderate	2
Campo Band of Diegueno Mission Indians of the Campo Indian Reservation, California (tribal code 570)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3
Capitan Grande Band of Diegueno Mission Indians of California: (Barona Group of Capitan Grande Band of Mission Indians of the Barona Reservation, California; Viejas (Baron Long) Group of Capitan Grande Band of Mission Indians of the Viejas Reservation, California) (tribal code 571)	8-hour Ozone (1997)	San Diego	Maintenance	Subpart 2/Moderate	2

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Capitan Grande Band of Diegueno Mission Indians of California: (Barona Group of Capitan Grande Band of Mission Indians of the Barona Reservation, California; Viejas (Baron Long) Group of Capitan Grande Band of Mission Indians of the Viejas Reservation, California) (tribal code 571)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3
Chemehuevi Indian Tribe of the Chemehuevi Reservation, California (tribal code 695)	PM-10 (1990)	San Bernardino County (part); excluding Searles Valley Planning area and South Coast Air Basin	Nonattainment	Moderate	3
Chicken Ranch Rancheria of Me-Wuk Indians of California (tribal code 523)	8-hour Ozone (1997)	Mariposa and Tuolumne Cos. (Southern Mountain Counties)	Nonattainment	Subpart 2/Moderate	2
Cocopah Tribe of Arizona (tribal code 602)	PM-10 (1990)	Yuma County; Yuma planning area	Nonattainment	Moderate	3
Cold Springs Rancheria of Mono Indians of California (tribal code 511)	8-hour Ozone (1997)	San Joaquin Valley Area	Nonattainment	Subpart 2/Extreme	1
Cold Springs Rancheria of Mono Indians of California (tribal code 511)	PM-2.5 (2006)	San Joaquin Valley	Nonattainment	Moderate	2
Cold Springs Rancheria of Mono Indians of California (tribal code 511)	PM-2.5 (1997)	San Joaquin Valley	Nonattainment	Moderate	2
Cold Springs Rancheria of Mono Indians of California (tribal code 511)	PM-10 (1990)	San Joaquin Valley Air Basin; Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus, Tulare Counties	Maintenance	Serious	3

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Colorado River Indian Tribes of the Colorado River Indian Reservation, Arizona and California (tribal code 603)	PM-10 (1990)	San Bernardino County (part); excluding Searles Valley Planning area and South Coast Air Basin	Nonattainment	Moderate	3
Ely Shoshone Tribe of Nevada (tribal code 644)	Sulfur Dioxide (1978)	Central Steptoe Valley	Maintenance		3
Enterprise Rancheria of Maidu Indians of California (tribal code 517)	8-hour Ozone (1997)	Chico	Nonattainment	Subpart 2/Marginal	2
Enterprise Rancheria of Maidu Indians of California (tribal code 517)	PM-2.5 (2006)	Chico	Nonattainment	Moderate	1.5
Ewiiaapaayp Band of Kumeyaay Indians, California (tribal code 573)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3
Fort Independence Indian Community of Paiute Indians of the Fort Independence Reservation, California (tribal code 525)	PM-10 (1990)	Inyo County; Owens Valley planning area	Nonattainment	Serious	3
Fort McDowell Yavapai Nation, Arizona (tribal code 613)	8-hour Ozone (1997)	Phoenix-Mesa	Maintenance	Subpart 2/Marginal	2
Fort McDowell Yavapai Nation, Arizona (tribal code 613)	PM-10 (1990)	Maricopa and Pinal Counties; Phoenix planning area	Nonattainment	Serious	3
Fort McDowell Yavapai Nation, Arizona (tribal code 613)	Carbon Monoxide (1990)	Phoenix Area	Maintenance	Serious	3
Fort Mojave Indian Tribe of Arizona, California & Nevada (tribal code 604)	PM-10 (1990)	Mohave County (part); Bullhead City	Maintenance	Moderate	3

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Fort Mojave Indian Tribe of Arizona, California & Nevada (tribal code 604)	PM-10 (1990)	San Bernardino County (part); excluding Searles Valley Planning area and South Coast Air Basin	Nonattainment	Moderate	3
Gila River Indian Community of the Gila River Indian Reservation, Arizona (tribal code 614)	Carbon Monoxide (1990)	Phoenix Area	Maintenance	Serious	3
Gila River Indian Community of the Gila River Indian Reservation, Arizona (tribal code 614)	PM-10 (1990)	Maricopa and Pinal Counties; Phoenix planning area	Nonattainment	Serious	3
Iipay Nation of Santa Ysabel, California (previously listed as the Santa Ysabel Band of Diegueno Mission Indians of the Santa Ysabel Reservation) (tribal code 592)	8-hour Ozone (1997)	San Diego	Maintenance	Subpart 2/Moderate	2
Iipay Nation of Santa Ysabel, California (previously listed as the Santa Ysabel Band of Diegueno Mission Indians of the Santa Ysabel Reservation) (tribal code 592)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3
Inaja Band of Diegueno Mission Indians of the Inaja and Cosmit Reservation, California (tribal code 574)	8-hour Ozone (1997)	San Diego	Maintenance	Subpart 2/Moderate	2
Inaja Band of Diegueno Mission Indians of the Inaja and Cosmit Reservation, California (tribal code 574)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3
Ione Band of Miwok Indians of California (tribal code 529)	8-hour Ozone (1997)	Amador and Calaveras Cos. (Central Mountain Cos.)	Nonattainment	Subpart 2/Moderate	2

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Jackson Rancheria of Me-Wuk Indians of California (tribal code 522)	8-hour Ozone (1997)	Amador and Calaveras Cos. (Central Mountain Cos.)	Nonattainment	Subpart 2/Moderate	2
Jamul Indian Village of California (tribal code 575)	8-hour Ozone (1997)	San Diego	Maintenance	Subpart 2/Moderate	2
Jamul Indian Village of California (tribal code 575)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3
La Jolla Band of Luiseno Indians, California (previously listed as the La Jolla Band of Luiseno Mission Indians of the La Jolla Reservation) (tribal code 576)	8-hour Ozone (1997)	San Diego	Maintenance	Subpart 2/Moderate	2
La Jolla Band of Luiseno Indians, California (previously listed as the La Jolla Band of Luiseno Mission Indians of the La Jolla Reservation) (tribal code 576)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3
La Posta Band of Diegueno Mission Indians of the La Posta Indian Reservation, California (tribal code 577)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3
Las Vegas Tribe of Paiute Indians of the Las Vegas Indian Colony, Nevada (tribal code 648)	8-hour Ozone (1997)	Las Vegas	Maintenance	Subpart 2/Marginal	2
Las Vegas Tribe of Paiute Indians of the Las Vegas Indian Colony, Nevada (tribal code 648)	PM-10 (1990)	Clark County; Las Vegas planning area	Maintenance	Serious	3
Las Vegas Tribe of Paiute Indians of the Las Vegas Indian Colony, Nevada (tribal code 648)	Carbon Monoxide (1990)	Las Vegas Area	Maintenance	Serious	3

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Lone Pine Paiute-Shoshone Tribe (previously listed as the Paiute-Shoshone Indians of the Lone Pine Community of the Lone Pine Reservation, California) (tribal code 624)	PM-10 (1990)	Inyo County; Owens Valley planning area	Nonattainment	Serious	3
Los Coyotes Band of Cahuilla and Cupeno Indians, California (previously listed as the Los Coyotes Band of Cahuilla & Cupeno Indians of the Los Coyotes Reservation) (tribal code 578)	8-hour Ozone (1997)	San Diego	Maintenance	Subpart 2/Moderate	2
Los Coyotes Band of Cahuilla and Cupeno Indians, California (previously listed as the Los Coyotes Band of Cahuilla & Cupeno Indians of the Los Coyotes Reservation) (tribal code 578)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3
Lytton Rancheria of California (tribal code 509)	8-hour Ozone (1997)	San Francisco Bay Area	Nonattainment	Subpart 2/Marginal	2
Lytton Rancheria of California (tribal code 509)	PM-2.5 (2006)	San Francisco Bay Area	Nonattainment	Moderate	1.5
Mesa Grande Band of Diegueno Mission Indians of the Mesa Grande Reservation, California (tribal code 580)	8-hour Ozone (1997)	San Diego	Maintenance	Subpart 2/Moderate	2
Mesa Grande Band of Diegueno Mission Indians of the Mesa Grande Reservation, California (tribal code 580)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3
Mooretown Rancheria of Maidu Indians of California (tribal code 626)	8-hour Ozone (1997)	Chico	Nonattainment	Subpart 2/Marginal	2

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Mooretown Rancheria of Maidu Indians of California (tribal code 626)	PM-2.5 (2006)	Chico	Nonattainment	Moderate	1.5
Morongo Band of Mission Indians, California (previously listed as the Morongo Band of Cahuilla Mission Indians of the Morongo Reservation) (tribal code 582)	8-hour Ozone (1997)	Los Angeles-South Coast Air Basin Area	Nonattainment	Subpart 2/Extreme	1
Morongo Band of Mission Indians, California (previously listed as the Morongo Band of Cahuilla Mission Indians of the Morongo Reservation) (tribal code 582)	PM-2.5 (2006)	Los Angeles-South Coast Air Basin	Nonattainment	Moderate	2
Morongo Band of Mission Indians, California (previously listed as the Morongo Band of Cahuilla Mission Indians of the Morongo Reservation) (tribal code 582)	PM-2.5 (1997)	Los Angeles-South Coast Air Basin	Nonattainment	Moderate	2
Morongo Band of Mission Indians, California (previously listed as the Morongo Band of Cahuilla Mission Indians of the Morongo Reservation) (tribal code 582)	PM-10 (1990)	Riverside, Los Angeles, Orange, and San Bernardino Counties; South Coast Air Basin	Maintenance	Serious	3
Morongo Band of Mission Indians, California (previously listed as the Morongo Band of Cahuilla Mission Indians of the Morongo Reservation) (tribal code 582)	Carbon Monoxide (1990)	Los Angeles-South Coast Air Basin Area	Maintenance	Serious	3
Northfork Rancheria of Mono Indians of California (tribal code 532)	8-hour Ozone (1997)	San Joaquin Valley Area	Nonattainment	Subpart 2/Extreme	1
Northfork Rancheria of Mono Indians of California (tribal code 532)	PM-2.5 (2006)	San Joaquin Valley	Nonattainment	Moderate	2
Northfork Rancheria of Mono Indians of California (tribal code 532)	PM-2.5 (1997)	San Joaquin Valley	Nonattainment	Moderate	2

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Northfork Rancheria of Mono Indians of California (tribal code 532)	PM-10 (1990)	San Joaquin Valley Air Basin; Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus, Tulare Counties	Maintenance	Serious	3
Pala Band of Luiseno Mission Indians of the Pala Reservation, California (tribal code 583)	8-hour Ozone (1997)	San Diego	Maintenance	Subpart 2/Moderate	2
Pala Band of Luiseno Mission Indians of the Pala Reservation, California (tribal code 583)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3
Pauma Band of Luiseno Mission Indians of the Pauma & Yuima Reservation, California (tribal code 585)	8-hour Ozone (1997)	San Diego	Maintenance	Subpart 2/Moderate	2
Pauma Band of Luiseno Mission Indians of the Pauma & Yuima Reservation, California (tribal code 585)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3
Pechanga Band of Luiseno Mission Indians of the Pechanga Reservation, California (tribal code 586)	8-hour Ozone (1997)	Los Angeles-South Coast Air Basin Area	Nonattainment	Subpart 2/Extreme	1
Pechanga Band of Luiseno Mission Indians of the Pechanga Reservation, California (tribal code 586)	PM-2.5 (2006)	Los Angeles-South Coast Air Basin	Nonattainment	Moderate	2
Pechanga Band of Luiseno Mission Indians of the Pechanga Reservation, California (tribal code 586)	PM-2.5 (1997)	Los Angeles-South Coast Air Basin	Nonattainment	Moderate	2

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Pechanga Band of Luiseno Mission Indians of the Pechanga Reservation, California (tribal code 586)	PM-10 (1990)	Riverside, Los Angeles, Orange, and San Bernardino Counties; South Coast Air Basin	Maintenance	Serious	3
Pechanga Band of Luiseno Mission Indians of the Pechanga Reservation, California (tribal code 586)	Carbon Monoxide (1990)	Los Angeles-South Coast Air Basin Area	Maintenance	Serious	3
Pechanga Band of Luiseno Mission Indians of the Pechanga Reservation, California (tribal code 586)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3
Picayune Rancheria of Chukchansi Indians of California (tribal code 534)	8-hour Ozone (1997)	San Joaquin Valley Area	Nonattainment	Subpart 2/Extreme	1
Picayune Rancheria of Chukchansi Indians of California (tribal code 534)	PM-2.5 (2006)	San Joaquin Valley	Nonattainment	Moderate	2
Picayune Rancheria of Chukchansi Indians of California (tribal code 534)	PM-2.5 (1997)	San Joaquin Valley	Nonattainment	Moderate	2
Picayune Rancheria of Chukchansi Indians of California (tribal code 534)	PM-10 (1990)	San Joaquin Valley Air Basin; Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus, Tulare Counties	Maintenance	Serious	3
Quechan Tribe of the Fort Yuma Indian Reservation, California & Arizona (tribal code 696)	8-hour Ozone (1997)	Imperial County Area	Nonattainment	Subpart 2/Moderate	2
Ramona Band of Cahuilla, California (previously listed as the Ramona Band or Village of Cahuilla Mission Indians of California) (tribal code 597)	8-hour Ozone (1997)	Los Angeles-South Coast Air Basin Area	Nonattainment	Subpart 2/Extreme	1

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Ramona Band of Cahuilla, California (previously listed as the Ramona Band or Village of Cahuilla Mission Indians of California) (tribal code 597)	PM-2.5 (2006)	Los Angeles-South Coast Air Basin	Nonattainment	Moderate	2
Ramona Band of Cahuilla, California (previously listed as the Ramona Band or Village of Cahuilla Mission Indians of California) (tribal code 597)	PM-2.5 (1997)	Los Angeles-South Coast Air Basin	Nonattainment	Moderate	2
Ramona Band of Cahuilla, California (previously listed as the Ramona Band or Village of Cahuilla Mission Indians of California) (tribal code 597)	PM-10 (1990)	Riverside, Los Angeles, Orange, and San Bernardino Counties; South Coast Air Basin	Maintenance	Serious	3
Ramona Band of Cahuilla, California (previously listed as the Ramona Band or Village of Cahuilla Mission Indians of California) (tribal code 597)	Carbon Monoxide (1990)	Los Angeles-South Coast Air Basin Area	Maintenance	Serious	3
Reno-Sparks Indian Colony, Nevada (tribal code 653)	PM-10 (1990)	Washoe County; Reno planning area	Nonattainment	Serious	3
Reno-Sparks Indian Colony, Nevada (tribal code 653)	Carbon Monoxide (1990)	Reno Area	Maintenance	Moderate <= 12.7ppm	3
Rincon Band of Luiseno Mission Indians of the Rincon Reservation, California (tribal code 587)	8-hour Ozone (1997)	San Diego	Maintenance	Subpart 2/Moderate	2
Rincon Band of Luiseno Mission Indians of the Rincon Reservation, California (tribal code 587)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Salt River Pima-Maricopa Indian Community of the Salt River Reservation, Arizona (tribal code 615)	8-hour Ozone (1997)	Phoenix-Mesa	Maintenance	Subpart 2/Marginal	2
Salt River Pima-Maricopa Indian Community of the Salt River Reservation, Arizona (tribal code 615)	PM-10 (1990)	Maricopa and Pinal Counties; Phoenix planning area	Nonattainment	Serious	3
Salt River Pima-Maricopa Indian Community of the Salt River Reservation, Arizona (tribal code 615)	Carbon Monoxide (1990)	Phoenix Area	Maintenance	Serious	3
San Carlos Apache Tribe of the San Carlos Reservation, Arizona (tribal code 616)	Sulfur Dioxide (1978)	Miami	Maintenance		0
San Carlos Apache Tribe of the San Carlos Reservation, Arizona (tribal code 616)	Sulfur Dioxide (1978)	Morenci	Maintenance		3
San Carlos Apache Tribe of the San Carlos Reservation, Arizona (tribal code 616)	Sulfur Dioxide (1978)	Hayden	Nonattainment		3
San Manuel Band of Mission Indians, California (previously listed as the San Manual Band of Serrano Mission Indians of the San Manual Reservation) (tribal code 588)	8-hour Ozone (1997)	Los Angeles-South Coast Air Basin Area	Nonattainment	Subpart 2/Extreme	1
San Manuel Band of Mission Indians, California (previously listed as the San Manual Band of Serrano Mission Indians of the San Manual Reservation) (tribal code 588)	PM-2.5 (2006)	Los Angeles-South Coast Air Basin	Nonattainment	Moderate	2
San Manuel Band of Mission Indians, California (previously listed as the San Manual Band of Serrano Mission Indians of	PM-2.5 (1997)	Los Angeles-South Coast Air Basin	Nonattainment	Moderate	2

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
the San Manual Reservation) (tribal code 588)					
San Manuel Band of Mission Indians, California (previously listed as the San Manual Band of Serrano Mission Indians of the San Manual Reservation) (tribal code 588)	PM-10 (1990)	Riverside, Los Angeles, Orange, and San Bernardino Counties; South Coast Air Basin	Maintenance	Serious	3
San Manuel Band of Mission Indians, California (previously listed as the San Manual Band of Serrano Mission Indians of the San Manual Reservation) (tribal code 588)	Carbon Monoxide (1990)	Los Angeles-South Coast Air Basin Area	Maintenance	Serious	3
San Pasqual Band of Diegueno Mission Indians of California (tribal code 589)	8-hour Ozone (1997)	San Diego	Maintenance	Subpart 2/Moderate	2
San Pasqual Band of Diegueno Mission Indians of California (tribal code 589)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3
Santa Rosa Band of Cahuilla Indians, California (previously listed as the Santa Rosa Band of Cahuilla Mission Indians of the Santa Rosa Reservation) (tribal code 590)	8-hour Ozone (1997)	Riverside County (Coachella Valley) Area	Nonattainment	Subpart 2/Severe 15	1
Santa Rosa Band of Cahuilla Indians, California (previously listed as the Santa Rosa Band of Cahuilla Mission Indians of the Santa Rosa Reservation) (tribal code 590)	8-hour Ozone (1997)	Los Angeles-South Coast Air Basin Area	Nonattainment	Subpart 2/Extreme	1
Santa Rosa Band of Cahuilla Indians, California (previously listed as the Santa	PM-2.5 (1997)	Los Angeles-South Coast Air Basin	Nonattainment	Moderate	2

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Rosa Band of Cahuilla Mission Indians of the Santa Rosa Reservation) (tribal code 590)					
Santa Rosa Band of Cahuilla Indians, California (previously listed as the Santa Rosa Band of Cahuilla Mission Indians of the Santa Rosa Reservation) (tribal code 590)	PM-10 (1990)	Riverside, Los Angeles, Orange, and San Bernardino Counties; South Coast Air Basin	Maintenance	Serious	3
Santa Rosa Band of Cahuilla Indians, California (previously listed as the Santa Rosa Band of Cahuilla Mission Indians of the Santa Rosa Reservation) (tribal code 590)	PM-10 (1990)	Riverside County; Coachella Valley planning area	Nonattainment	Serious	3
Santa Rosa Band of Cahuilla Indians, California (previously listed as the Santa Rosa Band of Cahuilla Mission Indians of the Santa Rosa Reservation) (tribal code 590)	Carbon Monoxide (1990)	Los Angeles-South Coast Air Basin Area	Maintenance	Serious	3
Santa Rosa Indian Community of the Santa Rosa Rancheria, California (tribal code 542)	8-hour Ozone (1997)	San Joaquin Valley Area	Nonattainment	Subpart 2/Extreme	1
Santa Rosa Indian Community of the Santa Rosa Rancheria, California (tribal code 542)	PM-2.5 (2006)	San Joaquin Valley	Nonattainment	Moderate	2
Santa Rosa Indian Community of the Santa Rosa Rancheria, California (tribal code 542)	PM-2.5 (1997)	San Joaquin Valley	Nonattainment	Moderate	2
Santa Rosa Indian Community of the Santa Rosa Rancheria, California (tribal code 542)	PM-10 (1990)	San Joaquin Valley Air Basin; Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus, Tulare Counties	Maintenance	Serious	3
Shingle Springs Band of Miwok Indians, Shingle Springs Rancheria (Verona Tract),	8-hour Ozone (1997)	Sacramento Metro Area	Nonattainment	Subpart 2/Severe	1

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
California (tribal code 546)				15	
Shingle Springs Band of Miwok Indians, Shingle Springs Rancheria (Verona Tract), California (tribal code 546)	PM-2.5 (2006)	Sacramento	Nonattainment	Moderate	1.5
Soboba Band of Luiseno Indians, California (tribal code 593)	8-hour Ozone (1997)	Los Angeles-South Coast Air Basin Area	Nonattainment	Subpart 2/Extreme	1
Soboba Band of Luiseno Indians, California (tribal code 593)	PM-2.5 (2006)	Los Angeles-South Coast Air Basin	Nonattainment	Moderate	2
Soboba Band of Luiseno Indians, California (tribal code 593)	PM-2.5 (1997)	Los Angeles-South Coast Air Basin	Nonattainment	Moderate	2
Soboba Band of Luiseno Indians, California (tribal code 593)	PM-10 (1990)	Riverside, Los Angeles, Orange, and San Bernardino Counties; South Coast Air Basin	Maintenance	Serious	3
Soboba Band of Luiseno Indians, California (tribal code 593)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3
Sycuan Band of the Kumeyaay Nation (tribal code 594)	8-hour Ozone (1997)	San Diego	Maintenance	Subpart 2/Moderate	2
Sycuan Band of the Kumeyaay Nation (tribal code 594)	Carbon Monoxide (1990)	San Diego Area	Maintenance	Moderate <= 12.7ppm	3
Table Mountain Rancheria of California (tribal code 551)	8-hour Ozone (1997)	San Joaquin Valley Area	Nonattainment	Subpart 2/Extreme	1
Table Mountain Rancheria of California (tribal code 551)	PM-2.5 (2006)	San Joaquin Valley	Nonattainment	Moderate	2
Table Mountain Rancheria of California	PM-2.5 (1997)	San Joaquin Valley	Nonattainment	Moderate	2

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
(tribal code 551)					
Table Mountain Rancheria of California (tribal code 551)	PM-10 (1990)	San Joaquin Valley Air Basin; Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus, Tulare Counties	Maintenance	Serious	3
Tohono O'Odham Nation of Arizona (tribal code 610)	PM-10 (1990)	Pima County; Rillito planning area	Nonattainment	Moderate	3
Tonto Apache Tribe of Arizona (tribal code 674)	PM-10 (1990)	Gila County (part): Payson	Maintenance	Moderate	3
Torres Martinez Desert Cahuilla Indians, California (previously listed as the Torres-Martinez Band of Cahuilla Mission Indians of California) (tribal code 595)	8-hour Ozone (1997)	Riverside County (Coachella Valley) Area	Nonattainment	Subpart 2/Severe 15	1
Torres Martinez Desert Cahuilla Indians, California (previously listed as the Torres-Martinez Band of Cahuilla Mission Indians of California) (tribal code 595)	8-hour Ozone (1997)	Imperial County Area	Nonattainment	Subpart 2/Moderate	2
Torres Martinez Desert Cahuilla Indians, California (previously listed as the Torres-Martinez Band of Cahuilla Mission Indians of California) (tribal code 595)	PM-10 (1990)	Riverside County; Coachella Valley planning area	Nonattainment	Serious	3
Torres Martinez Desert Cahuilla Indians, California (previously listed as the Torres-Martinez Band of Cahuilla Mission Indians of California) (tribal code 595)	PM-10 (1990)	Imperial County; Imperial Valley planning area	Nonattainment	Serious	3
Tule River Indian Tribe of the Tule River Reservation, California (tribal code 553)	8-hour Ozone (1997)	San Joaquin Valley Area	Nonattainment	Subpart 2/Extreme	1

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Tule River Indian Tribe of the Tule River Reservation, California (tribal code 553)	PM-2.5 (2006)	San Joaquin Valley	Nonattainment	Moderate	2
Tule River Indian Tribe of the Tule River Reservation, California (tribal code 553)	PM-2.5 (1997)	San Joaquin Valley	Nonattainment	Moderate	2
Tule River Indian Tribe of the Tule River Reservation, California (tribal code 553)	PM-10 (1990)	San Joaquin Valley Air Basin; Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus, Tulare Counties	Maintenance	Serious	3
Tuolumne Band of Me-Wuk Indians of the Tuolumne Rancheria of California (tribal code 634)	8-hour Ozone (1997)	Mariposa and Tuolumne Cos. (Southern Mountain Counties)	Nonattainment	Subpart 2/Moderate	2
Twenty-Nine Palms Band of Mission Indians of California (tribal code 598)	8-hour Ozone (1997)	Riverside County (Coachella Valley) Area	Nonattainment	Subpart 2/Severe 15	1
Twenty-Nine Palms Band of Mission Indians of California (tribal code 598)	8-hour Ozone (1997)	Los Angeles and San Bernardino Counties (Western Mojave Desert)	Nonattainment	Subpart 2/Severe 15	2
Twenty-Nine Palms Band of Mission Indians of California (tribal code 598)	PM-10 (1990)	Riverside County; Coachella Valley planning area	Nonattainment	Serious	3
Twenty-Nine Palms Band of Mission Indians of California (tribal code 598)	PM-10 (1990)	San Bernardino County (part); excluding Searles Valley Planning area and South Coast Air Basin	Nonattainment	Moderate	3
United Auburn Indian Community of the Auburn Rancheria of California (tribal code 637)	8-hour Ozone (1997)	Sacramento Metro Area	Nonattainment	Subpart 2/Severe 15	1

Tribe Name	Pollutant (NAAQS)	Nonattainment Area Name	NA/Attain Status	Classification	Confidence Level
Yocha Dehe Wintun Nation, California (previously listed as the Rumsey Indian Rancheria of Wintun Indians of California) (tribal code 541)	8-hour Ozone (1997)	Sacramento Metro Area	Nonattainment	Subpart 2/Severe 15	1
Region 10					
Muckleshoot Indian Tribe (previously listed as the Muckleshoot Indian Tribe of the Muckleshoot Reservation, Washington) (tribal code 109)	Carbon Monoxide (1990)	Seattle-Tacoma Area	Maintenance	Moderate > 12.7ppm	1
Puyallup Tribe of the Puyallup Reservation (tribal code 115)	PM-2.5 (2006)	Tacoma	Nonattainment	Moderate	1
Puyallup Tribe of the Puyallup Reservation (tribal code 115)	PM-10 (1990)	Pierce County; Tacoma	Maintenance	Moderate	1
Puyallup Tribe of the Puyallup Reservation (tribal code 115)	Carbon Monoxide (1990)	Seattle-Tacoma Area	Maintenance	Moderate > 12.7ppm	1
Shoshone-Bannock Tribes of the Fort Hall Reservation (tribal code 180)	PM-10 (1990)	Power-Bannock Counties; Fort Hall Indian Reservation	Nonattainment	Moderate	1
Tulalip Tribes of Washington (previously listed as the Tulalip Tribes of the Tulalip Reservation, Washington) (tribal code 123)	Carbon Monoxide (1990)	Seattle-Tacoma Area	Maintenance	Moderate > 12.7ppm	1

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