



National Tribal Air Association's Fact Sheet on EPA's Indian Environmental General Assistance Program (GAP) 2013 Guidance

What is the GAP 2013 Guidance?

In 2013, the U.S. Environmental Protection Agency (EPA) released a guidebook to provide a framework for Tribes to build environmental program capacity using EPA's Indian Environmental General Assistance Program (GAP) resources. GAP grants are awarded annually to federally recognized Tribes and Tribal consortia for planning, developing, and establishing capacity to administer and implement environmental protection programs and solid and hazardous waste programs on Tribal lands.¹ The GAP Guidance outlines the criteria for receiving the grants, the mutual responsibilities of EPA and Tribes, and information about establishing and measuring environmental program goals and progress.² The 2013 Guidance was developed in consultation with Tribes from August 2011 through January 2012, and November 2012 through February 2013.³

What is the current status of the 2013 Guidance?

As of June 1, 2018, EPA has opened a consultation and coordination process with Tribes to conduct an evaluation of 2013 GAP Guidance, due to Tribes and Tribal Consortia voicing concerns about the Guidance. The consultation period will close on August 31, 2018. Once input has been gathered, reviewed, and the evaluation is completed, EPA may propose to revise the GAP Guidance. If that occurs, EPA will hold additional consultation and coordination on any proposed revisions or changes.⁴

What are some of the concerns Tribes have expressed about GAP Guidance as it relates to air programs?

NTAA is currently compiling concerns that NTAA member Tribes and NTAA Executive Committee members have brought forth from their respective regions. EPA has provided six consultation questions as part of the GAP Guidance evaluation for Tribes to consider to help prompt ideas on how to improve the 2013 Guidance. Those questions can be found in full on page 2 of Attachment 1 in the letter sent on May 24, 2018, by the Office of International Tribal Affairs,⁴ and are summarized here:

1. How does the 2013 GAP Guidance support your Tribe's needs for developing and submitting GAP applications?

¹ <https://www.epa.gov/tribal/indian-environmental-general-assistance-program-gap>

² <https://www.epa.gov/sites/production/files/2017-05/documents/2013-gap-guidance-final.pdf>

³ https://www.epa.gov/sites/production/files/2016-11/documents/gap_faq_november_2016_0.pdf

⁴ <https://tcots.epa.gov/apex/tcotspub/f?p=123:1:17587925723404:::> Click on "Notification pdf for Evaluating EPA's 2013 Guidance on the Award and Management of General Assistance Agreements for Tribes and Intertribal Consortia"

2. What kinds of environmental program capacity development work is your Tribe interested in, and what part of that work is not covered by the Guidance?
3. How can GAP Guidance better support Tribal capacity development for the programs that best manage the environment?
4. What measures or program outcomes are most important to your Tribal leadership and community, and how can EPA most effectively report on these through GAP funding?
5. To what degree has your Tribe used ETEPs? Has the approach in the Guidance been helpful? How can joint planning be improved?
6. How can the GAP Guidance more efficiently and effectively support Tribal environmental program goals while also demonstrating program results?

How can my Tribe provide comments?

All comments are due by August 31, 2018. The NTAA is developing a template letter for Tribes to use. Tribal governments may submit request government-to-government consultation and/or submit written comments via email to roose.rebecca@epa.gov, or by hardcopy to:

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