



## National Tribal Air Association's Fact Sheet on EPA's Draft FY 2018-2022 Strategic Plan

### ***What is the EPA's Draft FY 2018-2022 EPA Strategic Plan?***

EPA's Draft Strategic Plan (*Plan*) supports the four-year update required by the Government Performance and Results Act (GPRA) Modernization Act of 2010 (Public Law 111-352). This draft *Plan* advances the Administrator's priorities and identifies three strategic goals:

- **Core Mission:** Deliver real results to provide Americans with clean air, land, and water.
- **Cooperative Federalism:** Rebalance the power between Washington and the states to create tangible environmental results for the American people.
- **Rule of Law and Process:** Administer the law, as Congress intended, to refocus the Agency on its statutory obligations under the law.

Taken together, these goals are designed to transform the way the Agency does business and more efficiently and effectively delivers human health and environmental results. The strategies and strategic measures, including six Agency Priority Goals for FY 2018-2019, highlight the key areas in which the Agency will focus over the next four years.

The draft *Plan* is accessible through the following website: <http://www.regulations.gov/>

### ***What is included? What is not included that may be of concern to Tribes?***

*Included:* Several items of importance to Tribes were iterated in this *Plan* and are listed below.

- EPA recognizes the important role of Indian Tribes in the implementation of environmental programs, and identifies Tribes as partners in its efforts.
- EPA recognizes its trust responsibility to directly implement federal environmental laws in Indian country and to collaborate more efficiently and effectively with sovereign Tribal nations.
- EPA will work with Tribes consistent with the 2011 EPA Policy on Consultation and Coordination with Indian Tribes.

*Not included:* Several items of importance to Tribes were omitted in this *Plan* and are listed below.

- There is no mention of EPA activities in Alaska to assist Alaska Native Tribes and Alaska Native Villages.
- Failure to identify plans for addressing indoor air quality and radon mitigation.
- While the *Plan* does mention a goal of reducing non-attainment areas, the *Plan* does not include how or if EPA will take action to address ground-level ozone, which would save lives and reduce medical costs.

- Omitting climate change impacts, thus EPA has removed from its current draft *Plan* a goal that was included in EPA's 2014-2018 Strategic Plan Goal 1: Addressing Climate Change and Improving Air Quality.

### ***How does this affect my Tribe?***

The most significant concern is whether the proposed budget and staffing plans will allow EPA to provide the adequate support to Tribes and Alaska Native Villages that the *Plan* promises to make. EPA's budget needs to reflect the priorities described in the Plan.

While EPA is responsible for implementing programs, it is also responsible for implementing the Clean Air Act by assisting Tribal governments in establishing Tribal air programs. The Clean Air Act provides specifically for Tribes to assume authority for managing air quality on Indian reservations. This will require EPA staff to assist and train Tribal employees, and will require continued significant grants to fund program development.

Overall, EPA must enlarge its budget so that the necessary grants are available for Tribes to develop and maintain Tribal air programs, and the necessary EPA staff support is available to assist in training and development.

### ***How do I comment?***

Submit your comments, identified by Docket ID No. [EPA-HQ-OA-2017-0533], to the Federal eRulemaking Portal: <http://www.regulations.gov/> Follow the online instructions for submitting comments. **Comments must be received on or before October 31, 2017.** The Agency contact is Vivian Daub, Director, Planning Division, Office of Planning, Analysis, and Accountability, Office of the Chief Financial Officer, [Daub.Vivian@epa.gov](mailto:Daub.Vivian@epa.gov) or (202) 564-6790.

The NTAA has developed comments and will have a template letter available for your use on NTAA's website at <http://www.ntaatribalair.org>, under the Policy Response Kits tab. For additional information, please contact Andy Bessler, NTAA Project Director, at [Andy.Bessler@nau.edu](mailto:Andy.Bessler@nau.edu), or (928) 523-0526.