

Appendix A: NTAA Tribal Air Quality Budget Analysis



Status of Tribal Air Report Budget Analysis June 2020



Cover photos:

Top row, left to right: Kootenai Tribe of Idaho air station, Bonners Ferry, Idaho; Twenty-Nine Palms Band of Mission Indians' air quality monitoring station, Coachella, California.

Middle row, left to right: Ute Mountain Ute Tribe's air quality station, Towaoc, Colorado; White Mountain Apache Timber Company site; Coeur d'Alene Tribe's air monitoring station.

Bottom row, left to right: Bishop Paiute Tribe's Air Quality Program's balloon launch with the National Weather Service; Shoshone-Bannock Tribe's primary site; Fond du Lac's air monitoring station.

The National Tribal Air Association (NTAA) was founded in 2002 through a grant from the EPA's Office of Air and Radiation. The NTAA serves 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 of the NTAA:

- 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 151 principal member Tribes. The NTAA uses its resources to support the efforts of all 574 federally recognized Tribal Nations in protecting and improving air quality under the Clean Air Act within their respective jurisdictions. Although the NTAA always seeks to represent consensus perspectives on any given issue, 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. More information on the NTAA can be found in the 2020 STAR.

1. Introduction

2020 is the 22nd anniversary of the promulgation of the Tribal Air Rule (TAR). The TAR has made it possible for Tribes to actively participate in the management of Tribal air resources to the degree that the Tribe is currently able, including the option of sole management by the Tribe. Over the last 22 years, Tribes have made great strides in taking on the challenges of



managing their air quality. Across the nation, Tribal air issues vary from permitting sources on-reservation, to monitoring for the criteria air pollutants, to participating in local, state, regional, and national work groups. Other program tasks include addressing indoor air quality issues, and reviewing and commenting on permits issued by other agencies.

However, as much as Tribes have progressed in the past 22 years, funding for Tribal air programs has become stagnant, even as program costs have increased, air quality issues such as wildfire smoke have worsened, and the cost of living has increased. Tribes are also expanding the areas of air quality management in which they participate, such as increasing participation in addressing emissions from mobile sources. Meanwhile, the nation seems to be operating in a near constant state of unpredictability when it comes to government funding in general. Continuing resolutions have become the new normal for Congressional spending, making it extremely difficult for Tribes to plan for future funding years and to keep operating without the government ever adjusting budget amounts. The activities carried out by Tribal programs have been impacted by funding shortfalls, with monitoring stations shut down and work group participation ending because travel and staffing funds are no longer available.

As the charts and tables in Appendix B of the 2020 STAR show, the work products delivered by Tribal programs have remained largely unchanged over the years, due to the hard work and dedication of Tribal staff when it comes to making do with very little, but this work cannot continue without an increase in funding. While FY2020 saw a modest increase in funding compared to the past seven years, it still falls far short of the high point in funding appropriation in FY2012, despite seven additional Tribes achieving federal recognition status, and the continuation of increases in cost of living.

Over the past several years, indicators of Tribal air program success grew in the following ways:

- The Treatment as a State (TAS) statute authorizes Tribes to manage programs under the CAA, including regulatory development, reviewing authority for Title V permits, the opportunity for PSD Redesignation of Reservation lands, air quality monitoring, etc. Between FY2012 and FY2020, the number of Tribes with non-regulatory TAS status increased from 34 to 60, and the number with regulatory TAS increased from 7 to 11.
- The number of Tribes currently operating air monitors, monitoring for criteria pollutants, hazardous air pollutants, and other pollutants under the National Atmospheric Deposition Program, has grown from 81 in FY2012 to 88 in FY2020.
- The number of Tribes with completed Emissions Inventories ranged from 74 in FY2012 to a peak of 86 in 2015, but has decreased to 62 in FY2020, down from 73 in FY2019.
- The number of Tribes with §103 grants increased from 67 in FY2017 to a peak of 82 in FY2018. This number fell to 74 in FY2020.
- The number of Tribes with §105 grants has increased from 34 in FY2015 to 47 in FY2020.

- 29 Tribes applied for, and 26 Tribes were determined eligible for, Volkswagen Settlement funds in the first round, which closed March 1, 2019, with approximately \$6 million available. The second round closed August 20, 2019, and will disperse \$14 million to 45 Tribes. The third round has been announced and is underway, with complete applications due August 28, 2020. These funds can be used in limited applications to replace certain old diesel engines with updated technology. However, not all applications may be useful to all Tribes.
- Since the DERA program began in 2009, 36 Tribes have received a total of \$11.4 million in funds to replace old, dirty diesel engines or vehicles with cleaner options.

2. Development of a Tribal Air Program

The first thing most Tribes with new air programs do is to complete an emissions inventory (EI). This helps a Tribe plot its air program's future course and decide whether or what type of monitors might be needed. Obtaining TAS status is also a natural next step for many (but not all) Tribes, and movement from §103 to §105 funding indicates movement from "project" to "program" status. However, these progressions are not free of costs. A §105 program receives priority funding, but significant non-federal matching Tribal funds are required to supplement these federal funds. Given the economic challenges that many Tribes face, it can be difficult for them to come up with this money. Further, §105 status can be difficult for Tribes to obtain due to EPA delays and inconsistencies. Some Tribes choose not to apply for 105 funding because this requires submittal of proof of Reservation boundaries, which are sometimes still under contention by states or local governments. Monitors are expensive to purchase, operate, and maintain. These activities require extensive training and experience. While training is available through the Tribal Air Monitoring Support (TAMS) Center and the Institute for Tribal Environmental Professionals (ITEP) for free or at reduced costs, many Tribes do not have travel funds or cannot spare staff time. Travel scholarships are sometimes available, but are limited. Additionally, most Tribes that have an air program operate with only one air program staff member. It can be difficult to travel for training when there is no one else to help run the program.

Training and Creating Institutional Knowledge

Statistics from ITEP show that 499 Tribes and Tribal organizations (and 9,960 individuals) received training through 2019 at either ITEP or the TAMS Center. When compared to the total of 574 federally recognized Tribes, this means that about 87% of Tribes (or Tribal organizations) across the nation have received some type of Tribally focused, air quality specific, environmental training. It is interesting to note that about 60% of the individuals trained are no longer in the air quality field. Only 10% of individuals who take an introductory air quality course go on to take five or more courses, indicating that overall Tribal air quality staff do not receive more than entry-level training.

Instructors notice that some Tribes send multiple staff to trainings. It is possible that this reflects growth of an air program because many Tribes begin air training with their General Assistance Program (GAP) staff, then expand to dedicated Tribal air staff and sometimes to supervisors or multiple staff members.

While it is possible that some programs are experiencing growth (as evidenced by having multiple staff from a single Tribe at a given training), it is also likely that the low percentage of individuals who go on to receive advanced training is reflective of high turnover rates in Tribal air programs due to stagnant wages and relatively low wages in comparison to state and federal counterparts. While many Tribes already know this to be true from their own personal experience, training data from the TAMS Center and ITEP support this statement. Since the number of Tribes with air grants is not increasing and Tribes with established air programs almost exclusively receive the available funding, the conclusion must be that Tribes are continually sending new staff to beginner level trainings to maintain air quality monitoring proficiency. It is rare or challenging to find enough participants to fill advanced level training classes.

Monitoring

A recent survey of Tribes operating monitors demonstrates that a significant portion of the monitors deployed in Indian Country are over ten years old. Although the data is not complete, the percentage of Tribal monitors older than ten years old could well be over 50%. Meanwhile, the number of Tribes with monitoring programs has increased only slightly, from 81 in 2012 to 88 in 2020. Tribes operating monitors report that even if there is money in their budget for day-to-day operation of these monitors, there often is not enough for audits, spare parts, repairs, or training.

It is difficult for Tribes to plan for repair and/or replacement of monitors because programs never know how long a monitor may continue to operate. Tribes can apply for funds for repair and replacement but unused funds need to be returned to the EPA at the end of each grant cycle and there is no guarantee they will be awarded again. Tribes try to make the best possible decisions as to whether a malfunctioning monitor needs to be replaced or if it can be repaired. The problem with this approach is that a program may invest thousands of dollars into repairs only to find these to be ineffective and have to pay thousands more to replace the monitor. The increasing cost of new monitors has also exacerbated this situation – while Tribes are continually expected to do more with less, the cost of a new monitor is estimated to have increased by about \$3,000 over the past few years.

Purchasing new or upgraded software for a monitor is another cost that is often unplanned for. A monitor may be operating correctly but need a software upgrade in order to keep operating or to keep communicating with a data logger or with a Tribe's IT department. Software licensing costs around \$2,500 per year but there are additional associated costs, such as sending the monitor to the manufacturer for the upgrade (hourly charge plus shipping) plus the inconvenience of having the monitor out of service for several days.

Ongoing vendor or outside technical support also increases annually. Tribes contract with outside entities to provide lab work, help with audits of monitoring equipment, and write quality assurance project plans.

Although the lack of reservation-specific monitoring data is detrimental to Tribes, it is also a loss for the monitoring community at large. CASTNET contacts at EPA say they would like to see more Tribal monitors in the central and northwest parts of the country, where gaps exist in the existing network, as can be seen in Figure 3. EPA consequently needs to rely on modeling data for locations where they do not have monitoring sites. Modeling is less accurate than data from monitors, especially if the spatial gaps between monitors are large. In conclusion, good data collection takes time and money.



Figure 3 Tribal CASTNET Sites

3. Funding Impacts on Tribal Air Programs

Stagnant or reduced Tribal funding impacts Tribes through a lack of completion of emissions inventory updates, reduced participation in Regional Planning Organizations (RPOs), and reduced ability to address non-attainment areas. Completed Tribal emissions inventories have decreased from 86 in 2015 to 62 in 2020, likely because funds are not available to update them after five years. RPO funding has simply disappeared since the early 2000s, meaning that Tribes cannot meaningfully participate in regional air quality decision making. The number of Tribal non-attainment areas has increased by 20% from 2018-2020 but monitoring budgets have not increased accordingly, leading to reduced ability for Tribes to address non-attainment areas.

The decrease in funding to both the EPA and to Tribal air programs is a double-edged sword when it comes to implementing the CAA on Tribal lands. Tribes are increasingly unable to “do it all” as a result of insufficient funding to meet their needs and must rely on EPA to address air pollution and compliance assurance issues on their reservations. Since EPA regional offices are located in urban areas, extensive travel on the part of EPA staff is required to conduct inspections or permitting site visits on or near reservations. However, decreased funding within EPA has made it even more difficult for EPA staff to justify travel to Indian Country. It would be more cost efficient to train Tribal staff to perform site inspections and to work with facilities on compliance assurance with the added benefit of trained staff who are locally situated to respond quickly to emergencies.

Likewise, any loss of Tribal monitors can place an additional burden on state agencies, some of whom have come to rely on Tribally purchased monitors and Tribal staff to operate equipment that helps the state assess its air quality and meet monitoring placement requirements.

Air Quality Needs Assessment

The preamble to the Tribal Authority Rule clearly stated the need for EPA to conduct a needs assessment for maintaining and improving air quality in Indian Country. While narrowly constructed needs assessments have been performed to address such things as capacity building, drinking water/wastewater, and indoor air quality funding, no comprehensive assessment of the air quality management needs in Indian Country exists today. Such an assessment would cost on the order of \$500,000 but would provide a wealth of information to EPA. The NTAA has consistently made the request for a comprehensive air quality needs assessment since 2016.

Unfunded Priorities

In recent years, the EPA’s priorities have changed, as shown by changes from previous years in the Strategic Plan and the National Program Manager’s Guidance. Several important areas have been removed from these planning documents, including indoor air quality, radon, and

climate change. These areas are especially important in Tribal communities because of the high poverty rate, high rates of asthma and diabetes, old and failing housing stocks, and old and failing infrastructure. Many Tribal homes are energy inefficient and were poorly built according to plans that did not take into account the local climate. Therefore, cases of mold are common and widespread. Increased flooding due to climate change has exacerbated the problem for many Tribes. Wildfire smoke is increasingly a concern for Tribal indoor air quality and ambient air quality, as wildfires have grown in incidence, size, and duration. Radon is a naturally occurring element found in many Tribal homes and offices. Remediation is relatively cheap (about \$2,200 per home) and effective but Tribal funding for evaluating these homes has decreased drastically and funding has never been available for remediation. Poor air quality due to climate change is a great concern for Tribes in many ways, including increased mold from flooding, increased impacts from wildfires, increased construction debris from floods and fires, increased levels of pollen from longer growing seasons, and increased levels of ozone due to higher temperatures. Climate change is also an issue that will have huge impacts on Tribes, from the loss of important species and other resources, such as crops and grazing land, and the increasing impacts of wildfires, drought, flooding, severe weather, and the erosion of topsoil in the western mountain states (which also leads to dust generation).¹ In short, not only are Tribes losing ground in terms of funding, but they are increasingly unable to direct what funds they receive to the issues that may need the most attention.

Unexpected Interruptions and Concerns

The introduction of the novel coronavirus has the potential to greatly impact Tribes, because it impacts the government, the public, and the public employee sector all at once. Tribal governments need to take whatever actions are appropriate to protect what is, in most cases, a severely underserved population with extremely prevalent underlying health issues. Tribal governments and workers are consistently underfunded and understaffed but must be prepared to take care of their people because they have little assurance that any other governmental entity will do so, they know best how to care for their people, and taking care of the vulnerable is a core Tribal value.

This may impact Tribal air programs in terms of completing work and meeting grant deadlines for deliverables. If Tribal buildings are closed, healthy employees will need to work from home. This introduces costs for providing computers, internet access, and software for these employees, along with providing cyber security and possibly for purchasing additional servers. Meanwhile, there are no cost savings on unused office spaces, since those spaces will eventually be filled once again.

¹ “Wind erosion and dust from US drylands: a review of causes, consequences, and solutions in a changing world”. Ecosphere. 18 March 2019. <https://doi.org/10.1022/ecs.2650>.

4. Tribal Air Program Budget Analysis

Tribes are not the only air agencies struggling with stagnant budgets. The National Association of Clean Air Agencies' (NACAA) website states that the EPA budget for state and local air grants has remained steady for about 15 years at roughly \$228 million despite increased workloads, rising costs of inflation, and health care.² NACAA showed that if this \$228 million amount was adjusted for inflation it would translate into \$315 million in today's dollars. As demonstrated in this budget analysis, Tribal air budgets have many additional challenges, beyond stagnancy.

FY2019

The 2020 STAR has shown that the health concerns facing Tribal nations have increased in recent years, while funding has remained stagnant, at best. From FY2012-FY2017, overall EPA funding remained fairly steady, reaching a peak of \$8.45 billion in FY2012, but followed a downward trend to a FY2018 budget of \$5.6 billion. In FY2019, funding increased only slightly to \$6.1 billion, meaning that the agency is still fighting to continue its efforts to protect air quality across the US and in Indian Country. Tribal air funding comes almost solely from EPA State and Tribal Assistance Grants (STAG). Peak Tribal funding occurred in 2012 at \$12.49 million, but only totaled \$11.35 million in FY2019. Most Tribes do not have the funding base to pay for these programs themselves. Tribes are unable to raise revenue through taxation, and even if they could do so, taxation would be unlikely to lead to much revenue. For those Tribes with the capacity to raise funds through other methods such as business ventures, providing housing and health care for their membership takes precedent since many Tribal members live below the poverty level. Replacing aging infrastructure on reservations is also a priority. Many Tribes also operate K-12 schools, colleges, detention facilities, and substance abuse treatment centers, to name just a few governmental entities that require internal revenue streams.

Because federal CAA funding has been stagnant, Tribes with existing air programs receive the vast majority of available funds, meaning that hundreds of remaining Tribes have little hope of establishing air programs, even though they may face serious air quality issues or exist in non-classified air sheds. Even as funding remains stagnant, the number of federally recognized Tribes has grown from 566 in 2012 to 574 in 2019. This problem is especially apparent in Region 3, where the number of federally recognized Tribes has grown from 0 in 2015 to 7 in 2018. None of these Tribes currently receives air funding.

This stagnation in funding can be seen in the leveling off or even decreases in the types of activities that indicate a growing Tribal air program, such as completion (or updating) of emissions inventories, the movement of Tribes from §103 to §105 funding, placement of new Tribal monitors, or submittal of new quality assurance project plans, and the pursuit of

² "FY 2018 Budget and Congressional Appropriations." NACAA - National Association of Clean Air Agencies, http://www.4cleanair.org/sites/default/files/Documents/NACAA_FY2021_Oral_Testimony-House.pdf

authorities such as Class I Redesignation, permitting authorities, Tribal Implementation Plan development, and TAS status. Figure 4 contrasts Tribal funding with rising inflation and cost of living increases.

FY2020

The President’s budget proposal for FY2020 requested \$6.1 billion for EPA, which is a \$2.8 billion (or 31%) decrease from the 2019 estimate, and proposed to “eliminate many voluntary and lower-priority activities,” although no further details were provided. STAG funds were 43.4% of this amount, or \$2.6 billion. On a somewhat more positive note, the budget proposed to enhance monitoring of America’s significant watersheds, particularly those requiring collaboration among numerous states, Tribes, and local or international governments. The NTAA recommends that the Administration propose a similar approach to enhancing air monitoring across the nation.

FY2021

The President’s proposed budget for FY2021, released on February 10, 2020, provides \$6.7 billion for EPA, which would be an increase of \$6 million, or 9.8%, compared to FY2020. Highlights of the budget include: protecting children’s health, reducing lead exposure, taking action on PFAS, reducing harmful algal blooms, and reducing regulatory overreach.

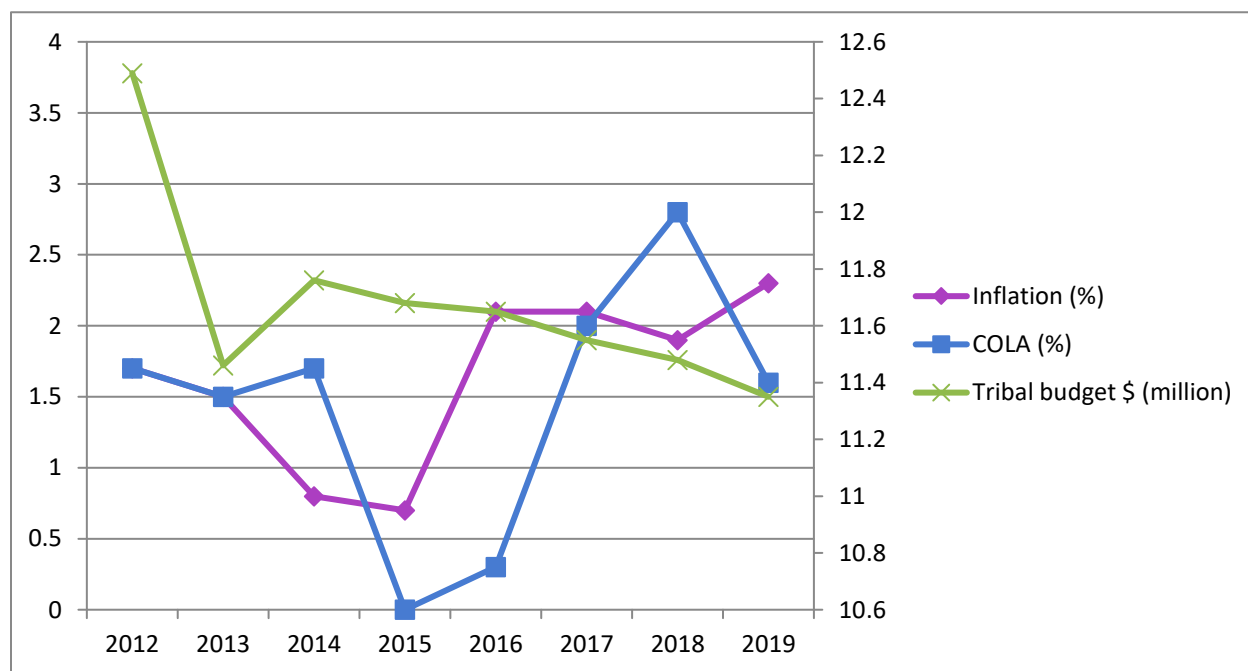


Figure 4 Tribal Funding vs. Cost of Living Adjustments (COLA) and Inflation

Increasing Tribal Monetary Needs

Program costs for health insurance benefits have continued to increase each year, decreasing the amount of program budgets available for staffing, equipment, supplies, training and transportation costs. In the period from 1991-2014, the average annual increase in health care costs in the US was 4.9%.³ From 2015-2017, these costs increased by 3% annually - slower, but still outpacing federal funding for Tribal programs. In 2018, the average premium for single coverage increased by 3% over 2017 and the average premium for family coverage increased by 5% (for our calculations, an average of 4% was assumed).⁴ The US Department of Labor estimates that benefits combined are worth about 30% of an employee's total compensation package.⁵ Many Tribes have higher compensatory costs than these, especially if their staff members have been employed with the Tribe for several years – their experience makes them very valuable but their salaries are higher than newer staff with less experience.

The problem of high employee turnover is explored in a February 4, 2016, article by Christina Merhar on the website Peoplekeep.com.⁶ The article claims that replacing a business employee costs an average of 6 to 9 month's salary due to hiring costs, training, and lost work time while the new employee comes up to speed. Similarly, a study by the Center for American Progress found that the cost of training a new employee can be roughly 16% of annual salary for those earning below \$30,000, and 20% of annual salary for those earning between \$30,000 and \$50,000. These costs are highly detrimental to Tribes and their air programs. As outlined above, Tribal air programs have difficulty retaining staff, due to stagnant wages and low wages relative to their state and federal counterparts.

Estimating that about 80% of any Tribe's air budget goes to salary and compensation, the 1996 initial appropriation of \$11 million, if increased to account for rising health care costs, would need to total a \$31 million appropriation today. Indirect costs, which are negotiated with the federal government, can also increase fairly drastically without warning, meaning that air budgets have already been set and must be revised to absorb the difference. These include administrative costs, space costs, and security costs. Improved grants management across EPA Regions may help with this issue.

If we look at the same problem in terms of general inflation, the 1996 initial appropriation of \$11 million would total \$18.1 million in FY2020 dollars if it kept pace with inflation

³<https://www.kff.org/other/state-indicator/avg-annual-growth-percapita/?currentTimeframe=0&sortModel=%7B%22colld%22%22Location%22,%22sort%22%22asc%22%7D>. Sources: Centers for Medicare & Medicaid Services, Office of the Actuary, National Health Statistics Group. National Health Expenditure Data: Health Expenditures by State of Residence, June 2017.

⁴ <https://www.kff.org/report-section/2018-employer-health-benefits-survey-section-1-cost-of-health-insurance/>

⁵ Steve Santiago, "The value of employer benefits," May 11, 2009, CAREER. Found at <https://www.bankrate.com/finance/financial-literacy/the-value-of-employer-benefits.aspx>.

⁶ Merhar, C. (2016, February 4). *Employee Retention – The Real Cost of Losing an Employee*. Retrieved from <https://www.peoplekeep.com/blog/bid/312123/employee-retention-the-real-cost-of-losing-an-employee>.

(www.usinflationcalculator.com). Instead, at \$11.77 million, absolute funding has barely changed and is, by these calculations, underfunded by 35%.

5. Conclusions and Recommendations

Based on the need for increased funding as outlined in this analysis, the NTAA recommends that the EPA consider the two budgeting solutions proposed below to alleviate some of the financial pressure on Tribal air programs. Both solutions exclude the cost of a comprehensive air quality needs assessment, which would require approximately \$500,000 of additional, dedicated funding.

Solution 1 accounts for basic inflationary costs, and totals \$18.1 million. This is an increase of \$7.1 million over the FY1996 appropriation, but in today's dollars is equal to that year's appropriation.

Solution 2 accounts for increases in health care costs, and totals \$31 million. Cost of living increases and basic inflationary costs are not included in this figure.

FY1996 appropriation	Solution 1: FY2021 (inflationary adjustment)	Solution 2: FY2021 (health care costs adjustment)
\$11 million	\$18.1 million	\$31 million

Appendix B: Data Tables of Tribal Air Quality Programs and Grants

Tribal Air Quality Monitoring Programs and Projects

Tribes significantly contribute to air quality protection, exercising Tribal sovereignty through air quality program activities. At the request of the NTAA, EPA's Office of Air and Radiation provided a set of data summarizing Tribal air activities from 2012-2020. A broad national summary of Tribal air quality programs can be found below, followed by regional summaries, with additional explanations of terms used in Appendix C.

The following data is used by the EPA to create budgets that influence CAA grant funding available to Tribes. The presentation of this data is illustrated in a simplified layout that is both easier to understand and more useful to readers. This simplified layout serves the important purpose of highlighting recent declines of funding and stagnation of Tribal air quality programs.

Please see **Appendix A** for a more in-depth Tribal Air Program budget analysis, which references these tables as well. The data set was provided to the NTAA by EPA's OAR Tribal System (OTS) database.

National Summary of Tribal Air Quality Programs

National Summary of Tribal Air Quality Programs									
	2012	2013	2014	2015	2016	2017	2018	2019	2020
STAG Funding (in millions)	\$12.49	\$11.46	\$11.76	\$11.68	\$11.65	\$11.55	\$11.48	\$11.35	\$11.77
Tribes Operating Air Monitors	81	83	84	83	85	83	85	86	88
Tribes w/ Completed EIs	74	73	84	86	84	80	78	73	62
Tribes w/ Non-Regulatory TAS	34	38	45	46	48	49	52	53	60
Tribes w/ Regulatory TAS	7	8	8	8	10	10	10	10	11
Major Sources on Reservations*	167	159	863	1626	1900	2991	342	367	368
Tribal Non-Attainment Areas	201	156	156	202	167	166	166	198	199
Tribes with 105 Grants	25	25	32	34	35	39	40	40	47
Tribes with 103 Grants	84	84	96	77	78	75	82	78	74

Table 3 National Summary of Tribal Air Quality Programs

*The values shown in this table reflect annual totals for all regions. The steep rise of Major Sources on Reservations in 2014-2017 is due to the introduction of new major source registration rules, which were applied to previously identified sources. This jump in major sources was caused by increased regulation, not by new pollutant sources. 2018-2020 totals are reflective only of actual permitted sources in Indian country.



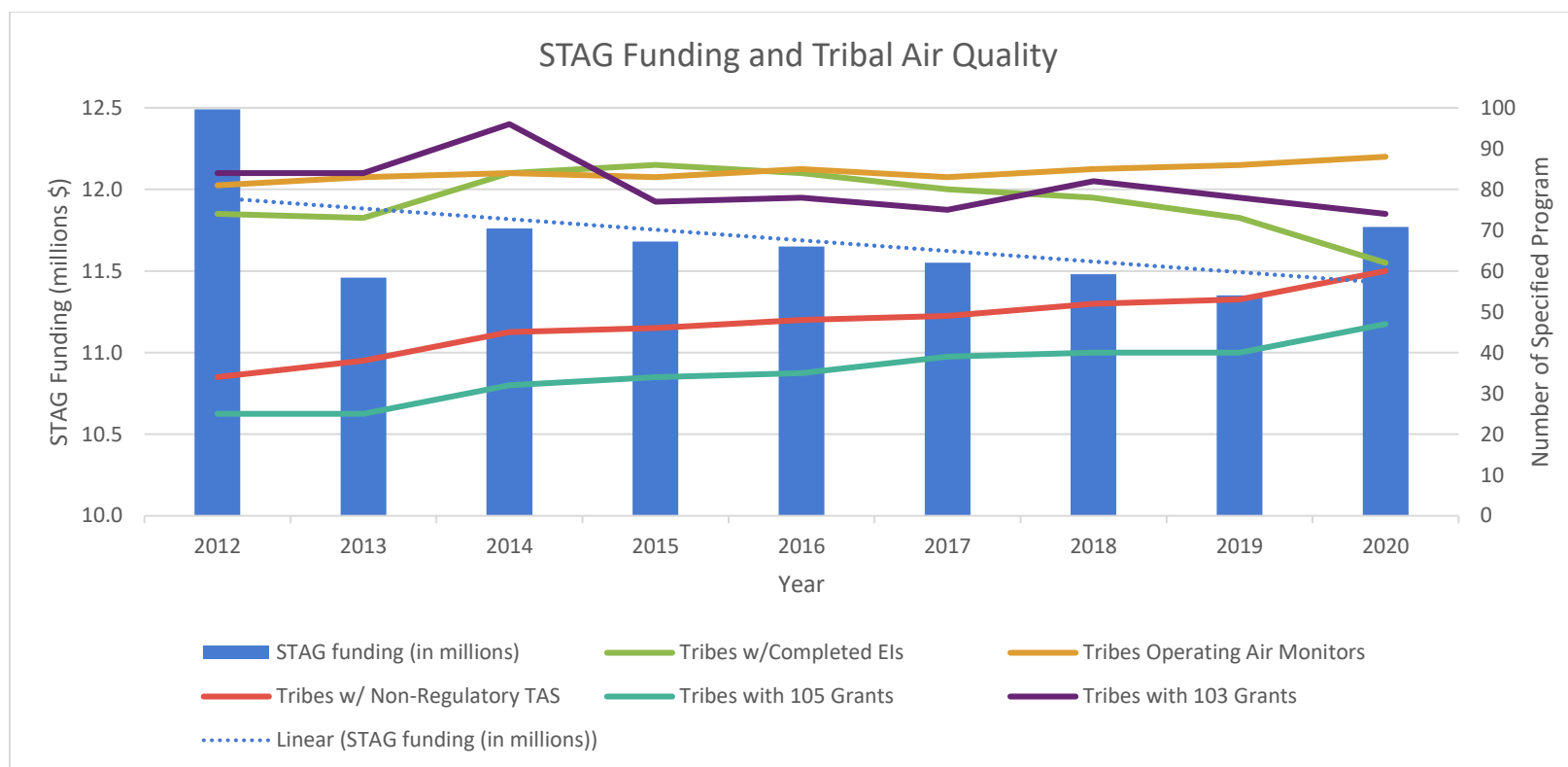


Table 4 STAG Funding and Tribal Air Quality Programs

Using the data provided, the average decrease of STAG funding is \$90,000/year from the time period of 2012 to 2020 (indicated by the “Linear” trend line). This decrease does not account for Cost of Living Adjustments (COLA). See **Appendix A: NTAA Tribal Air Quality Budget Analysis** for analysis of this information.

Regional Summaries of Tribal Air Quality Programs

Table 5 Regional Summaries of Tribal Air Quality Programs

Region 1 - Summary of Tribal Air Quality Programs									
	2012	2013	2014	2015	2016	2017	2018	2019	2020
STAG Funding (in thousands)	\$657	\$614	\$623	\$622	\$594	\$576	\$566	\$554	\$621
Tribes Operating Air Monitors	4	5	5	5	5	5	5	5	5
Tribes w/ Completed EIs	1	1	1	1	1	1	1	1	0
Tribes w/ Non-Regulatory TAS	1	2	2	2	2	2	2	2	4
Tribes w/ Regulatory TAS	2	2	2	2	2	2	2	2	2
Major Sources on Reservations	2	2	2	2	2	2	2	2	2
Tribal Non-Attainment Areas	5	5	5	5	3	3	3	3	5
Tribes with 105 Grants				2	2	2	2	2	4
Tribes with 103 Grants	8	8	8	4	4	4	5	5	4

Region 2 - Summary of Tribal Air Quality Programs									
	2012	2013	2014	2015	2016	2017	2018	2019	2020
STAG Funding (in thousands)	\$440	\$424	\$425	\$418	\$403	\$394	\$389	\$380	\$368
Tribes Operating Air Monitors	1	1	1	1	1	1	1	1	1
Tribes w/ Completed EIs	0	1	1	1	1	1	1	0	0
Tribes w/ Non-Regulatory TAS	1	1	1	1	1	1	1	1	1
Tribes w/ Regulatory TAS	1	1	1	1	1	1	1	1	1
Major Sources on Reservations	1	1	1	1	1	1	1	1	1
Tribal Non-Attainment Areas	5	4	4	4	1	1	1	1	1
Tribes with 105 Grants				1	1	1	1	1	1
Tribes with 103 Grants	2	2	2	0	2	1	1	1	1



Region 3 - Summary of Tribal Air Quality Programs	
	2020
STAG Funding (in thousands)	\$77
Tribes Operating Air Monitors	0
Tribes w/ Completed EIs	0
Tribes w/ Non-Regulatory TAS	0
Tribes w/ Regulatory TAS	0
Major Sources on Reservations	0
Tribal Non-Attainment Areas	0
Tribes with 105 Grants	0
Tribes with 103 Grants	0

Region 4 - Summary of Tribal Air Quality Programs									
	2012	2013	2014	2015	2016	2017	2018	2019	2020
STAG Funding (in thousands)	\$331	\$312	\$317	\$313	\$316	\$327	\$328	\$322	\$317
Tribes Operating Air Monitors	1	2	2	3	3	4	4	3	3
Tribes w/ Completed EIs	1	1	2	2	2	2	2	2	3
Tribes w/ Non-Regulatory TAS	1	1	1	1	1	1	1	1	1
Tribes w/ Regulatory TAS	0	0	0	0	0	0	0	0	0
Major Sources on Reservations	0	0	0	0	0	0	0	0	0
Tribal Non-Attainment Areas	1	0	0	0	0	0	0	0	0
Tribes with 105 Grants				1	1	1	1	1	1
Tribes with 103 Grants	2	2	3	3	3	4	4	3	3



Region 5 - Summary of Tribal Air Quality Programs

	2012	2013	2014	2015	2016	2017	2018	2019	2020
STAG Funding (in millions)	\$1.26	\$1.15	\$1.18	\$1.23	\$1.23	\$1.23	\$1.28	\$1.29	\$1.28
Tribes Operating Air Monitors	11	11	12	12	12	14	14	14	14
Tribes w/ Completed EIs	14	14	15	16	18	19	20	20	10
Tribes w/ Non-Regulatory TAS	4	4	5	5	5	6	7	7	8
Tribes w/ Regulatory TAS	0	0	0	0	0	0	0	0	0
Major Sources on Reservations	13	15	15	15	15	16	17	17	19
Tribal Non-Attainment Areas	5	5	5	5	4	4	4	4	4
Tribes with 105 Grants				5	5	5	7	7	8
Tribes with 103 Grants	15	15	19	11	12	10	10	9	8

Region 6 - Summary of Tribal Air Quality Programs

	2012	2013	2014	2015	2016	2017	2018	2019	2020
STAG Funding (in millions)	\$1.31	\$1.17	\$1.18	\$1.18	\$1.14	\$1.14	\$1.11	\$1.07	\$1.17
Tribes Operating Air Monitors	5	5	4	4	5	5	7	7	6
Tribes w/ Completed EIs	8	8	14	15	11	12	9	5	10
Tribes w/ Non-Regulatory TAS	2	2	3	3	4	4	5	6	7
Tribes w/ Regulatory TAS	0	0	0	0	0	0	0	0	0
Major Sources on Reservations	6	6	6	6	11	10	9	9	13
Tribal Non-Attainment Areas	0	0	0	0	0	0	0	0	1
Tribes with 105 Grants				0	0	1	1	1	3
Tribes with 103 Grants	9	9	9	10	7	8	15	12	11



Region 7 - Summary of Tribal Air Quality Programs

	2012	2013	2014	2015	2016	2017	2018	2019	2020
STAG Funding (in thousands)	\$465	\$434	\$500	\$525	\$535	\$535	\$575	\$605	\$563
Tribes Operating Air Monitors	4	4	5	4	4	4	5	6	4
Tribes w/ Completed EIs	6	6	6	6	6	6	6	6	4
Tribes w/ Non-Regulatory TAS	0	1	2	2	2	2	2	2	2
Tribes w/ Regulatory TAS	0	0	0	0	0	0	0	0	0
Major Sources on Reservations	4	4	4	4	4	4	4	4	4
Tribal Non-Attainment Areas	0	0	0	0	0	0	0	0	0
Tribes with 105 Grants				1	0	1	2	2	1
Tribes with 103 Grants	4	4	7	7	7	7	5	6	6



Region 8 - Summary of Tribal Air Quality Programs

	2012	2013	2014	2015	2016	2017	2018	2019	2020
STAG Funding (in millions)	\$2.11	\$2.00	\$2.10	\$2.07	\$2.00	\$1.98	\$1.89	\$1.83	\$1.89
Tribes Operating Air Monitors	10	10	10	10	10	10	9	9	11
Tribes w/ Completed EIs	18	13	14	14	14	8	8	8	4
Tribes w/ Non-Regulatory TAS	7	7	9	9	9	9	9	9	10
Tribes w/ Regulatory TAS	1	1	1	1	1	1	1	1	2
Major Sources on Reservations*	86	89/706**	702	1451	1719	2806	261	289	268
Tribal Non-Attainment Areas	3	3	3	3	3	3	3	4	2
Tribes with 105 Grants				7	6	8	8	8	8
Tribes with 103 Grants	11	11	11	14	14	13	13	13	16

*The steep rise of Major Sources on Reservations in 2014-2017 is due to the introduction of new major source registration rules, which were applied to previously identified sources. This includes newly identified oil and gas sources required to be registered for PSD permits. 2018 totals are reflective only of actual permitted sources in Indian country.

** In 2013, Region 8 reported this data using both old and new rules.

Region 9 - Summary of Tribal Air Quality Programs

	2012	2013	2014	2015	2016	2017	2018	2019	2020
STAG Funding (in millions)	\$3.26	\$2.93	\$2.97	\$2.89	\$2.97	\$2.92	\$2.87	\$2.84	\$2.88
Tribes Operating Air Monitors	29	29	29	29	30	29	27	28	30
Tribes w/ Completed EIs	17	19	21	21	24	24	24	24	10
Tribes w/ Non-Regulatory TAS	7	7	9	10	11	11	12	12	12
Tribes w/ Regulatory TAS	2	2	2	2	4	4	4	4	5
Major Sources on Reservations	21	21	21	21	22	22	22	18	25
Tribal Non-Attainment Areas	170	137	137	183	154	154	154	185	185
Tribes with 105 Grants				4	7	7	5	6	7
Tribes with 103 Grants	23	23	23	26	26	25	25	24	20



Region 10 - Summary of Tribal Air Quality Programs

	2012	2013	2014	2015	2016	2017	2018	2019	2020
STAG Funding (in millions)	\$2.66	\$2.42	\$2.47	\$2.44	\$2.46	\$2.45	\$2.47	\$2.44	\$2.60
Tribes Operating Air Monitors	16	16	16	15	15	13	13	13	14
Tribes w/ Completed EIs	9	10	10	10	7	7	7	7	21
Tribes w/ Non-Regulatory TAS	11	13	13	13	13	13	13	13	15
Tribes w/ Regulatory TAS	1	2	2	2	2	2	2	2	1
Major Sources on Reservations*	34	110	112	126	126	130	26	27	36
Tribal Non-Attainment Areas	12	2	2	2	1	1	1	1	1
Tribes with 105 Grants				13	13	13	13	12	14
Tribes with 103 Grants	10	10	14	2	3	3	4	5	5

*The steep rise of Major Sources on Reservations in 2014-2017 is due to the introduction of new major source registration rules, which were applied to previously identified sources. 2018 totals are reflective only of actual permitted sources in Indian country.

Tribal Diesel Emissions Reduction Act (DERA)

EPA's Tribal DERA program awards grants to federally recognized Tribes, intertribal consortium, or Alaskan Native Villages for projects that reduce emissions from diesel engines. The Tribal DERA program requires a high cost share commitment, which is a barrier for most Tribes. The graph below provides the total amount awarded from EPA, the total amount of cost share borne by the Tribes, and the total number of awards for each year since the program began in 2009. In 2020, the NTAA wrote to the EPA with recommendations on ways to improve the Tribal DERA program so that Tribes can better utilize the funds. For more information, see the related narrative in Section 3.4 Mobile Sources.

Table 6 Tribal DERA Grant Awards

