



September 29, 2026

Daniel Vaught
Program Analyst
Environmental Protection Agency
American Indian Environmental Office
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: EPA Tribal Partnership Network Review

Dear Mr. Vaught,

The National Tribal Air Association (NTAA) submits this letter regarding the U.S. Environmental Protection Agency's (EPA's) EPA Tribal Partnership Network Review. The NTAA is not a Tribal Partnership Group (TPG), it is a Tribal Air Policy organization. This information was shared with the American Indian Environmental Office (AIEO) during a virtual meeting with AIEO, however the NTAA was still included in the TPN Review Overview July 2026 document. Therefore, it is imperative that NTAA document in writing their response to this review.

In meetings AIEO has held with Regional Tribal Operation Committees (RTOCs), TPGs/organizations, the National Tribal Caucus (NTC), and NTAA, we have heard conflicting information as to why the review was being conducted. The AIEO has admitted that they do not have a specific agenda, are not sure of the reason behind the review and not clear on what the end goal will be. The NTAA also heard that the AIEO did not know what TPGs and the other organizations such as NTAA do, this also included RTOCs. This is very surprising since the AIEO is the office that works with Tribes on environmental issues. NTAA holds two in-person meetings each year and hosts an annual conference with the Institute of Tribal Environmental Professionals which has included AIEO and OITA, and we have also met with both offices many times over the last 26 years.

The NTAA is member-based organization with 160 Member Tribes. The organization's mission is to advance air quality management policies and programs, consistent with the needs, interests, and unique legal status of American Indian and Alaska Native Tribes. As such, 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 organization always seeks to represent consensus perspectives on any given issue, it is important to note that the views expressed by NTAA may not be agreed upon by all Tribes. Further, it is also important to understand that interactions with the organization do not substitute for Nation-to-Nation

consultation, which can only be achieved through direct communications between the federal government and American Indian Tribal Governments and Alaska Natives.

Several of the items that are being questioned in the review have to do with working with NTC. If this review was brought about due to issues from the NTC then they could have been handled through open communication directly with NTC and those parties rather than a review that does not have a clear focus and does not involve the correct entities affected. NTAA requested that an NTC representative attend the NTAA monthly Executive Committee meetings many years ago to ensure coordination. NTAA has also offered input to NTC for inclusion in the OMB Budget Document annually, which has been conducted for many years. The NTAA also develops a Status of Tribal Air Report (STAR) annually that is shared with Tribes, NTC and EPA/AIEO. All NTAA information is available on the NTAA website.

NTAA was formed by two Resolutions adopted by the National Congress of American Indians (NCAI), one to form the organization in 2000 and one to approve the Bylaws in 2002. NTAA is governed by the Member Tribes through an Executive Committee of one Primary and one Alternate per Region and Alaska which are delegated through the RTOCs or by the Region according to the Bylaws. The NTAA does not agree that the term “Tribal Partnership Group” is appropriate to describe itself. The NTAA Bylaws clearly state the organization’s mission, goals, membership, and duties.

The NTAA is Tribally driven. This is an important aspect that the EPA/AIEO review neglected to recognize. Moreover, many of the TPGs and organizations included in the review are not funded by GAP. Because OITA and AIEO’s purview is GAP, the organizations not funded by GAP should not be included in their review. During the review, AIEO omitted consideration for the fact that NTAA is working under a grant from the Office of Air and Radiation (OAR), has its own Project Officer and workplan that it must adhere to.

EPA/AIEO has been requesting that NTAA attend more meetings with the NTC even before the EPA/AIEO Review began which placed tasks outside of the NTAA workplan. During the review it was consistently stated that NTC reached out to TPGs and organizations to attend meetings with some not responding. The NTC and EPA/AIEO should be aware that unless it is in NTAA’s workplan tasks, it is up to NTAA to decide what extra work they are available to take on. It is a courtesy when NTAA adds additional meetings to the schedule, this means additional work for staff and the Executive Committee.

The NTAA provides the following comments on the “Guiding Questions” from the Overview: EPA Tribal Partnership Network Review July 2026:

How do Network groups currently interact with other Network groups?

When the NTAA would like to communicate with a specific organization, the NTAA Chair contacts the Tribal Chair of the organization. All the organizations know each other and work alongside each other. If a meeting is needed then we plan a meeting, it may have to be scheduled several weeks out due to busy schedules, however we always work it out.

The NTAA has concerns about this review since we have not received a clear answer as to why this review is being conducted and who implemented the review. There are also concerns that

there is still no confirmed goal or outcome for this review. The NTAA is concerned that this is another veiled attempt to limit or abolish the work of the TPGs, organizations, RTOCs and NTC.

What are best practices and where may there be opportunities for adjustment?

The coordinated effort on budget proposals should continue and if adjustments are needed NTAA would communicate directly to resolve any issues.

How do Network groups currently interact with EPA national program offices and regions?

One area that NTAA would like to see improvement is where the EPA has been less willing to meet with Tribes and provide information and background. For example, the NTAA hosts a monthly Air Policy Call to provide an opportunity for EPA and Tribes to discuss upcoming rules and programs. The EPA participation in these calls dropped significantly since the reorganization.

Chart:

One item not discussed yet is how information flows. NTAA noted that EPA/AIEO has a graphic with circles on each side and one in the middle in their document. The one in the middle is NTC and on one side is TPGs and the other is RTOCs with the question, “How do you think it should look and interact?” The NTAA has added a graphic (Attachment 1) to the end of this letter with an answer to the question. Please note that all TPGs, organizations and NTC representatives that have been chosen as representatives by the Tribes through the RTOCs report to the RTOCs, therefore they report to every Tribe within the nation. All these groups meet with EPA Headquarters as determined by their workplans and fulfill the tasks within their workplans. The NTAA has had a successful 26 years in this role and have also worked well with Tribes across the nation, Tribal organizations, EPA and federal agencies, and our regional, state and local partners.

What are the successes and challenges regarding effective communication and collaboration?

The NTAA will have new challenges getting information out now that many RTOCs have had the number of meetings cut. Limiting funding to Regions for RTOC meetings will have a trickle-down effect that further limits access to timely information.

NTAA successes include the development of Policy Resource Kits (PRKs) to support Tribes in participating in EPA’s rulemakings, webinars to support building Tribal capacity, monthly newsletters, the annual State of Tribal Air Report (STAR), to mention a few.

What does Network cross-representation currently look like (e.g., RTOC representation on NTC, TPG representation on NTC, RTOC representation on TPGs)?

The NTAA EC has members on both the RTOCs and NTC, the NTAA has always had an NTC Air Goal Lead that attends the NTAA monthly Executive Committee meetings. This was requested by NTAA years ago and NTC has worked with NTAA to facilitate this request.

Does it work well?

The NTAA believes that cross-communication works well and multiple positions can assist in information flow; however, it may not be for everyone, and everyone must weigh what they can take on. The NTAA Bylaws address how to handle absenteeism, which is most likely the case for all organizations. NTAA notes that absenteeism or lack of communication discussed in their document may not have anything to do with an individual being a representative on multiple organizations; it could be that their workplan tasks do not allow for additional meetings as previously discussed, or there are other reasons. NTAA believes that this is an odd line of questioning for this review given that each organization should only be speaking for itself and has its own resources for handling these types of situations. This should not be a concern for this review.

Are there any best practices that can be replicated in other parts of the Network?

No comment.

What are some possibilities for or barriers to maximizing Tribal participation and cross representation for Network groups? For example, what would be the benefits or implications regarding:

- o Changing the number of RTOC representatives on the NTC?**
- o Having TPG representatives concurrently sit on the NTC?**
- o Changing the number of RTOC representatives to concurrently sit on a TPG?**
- o Revising group compositions in other ways?**

The NTAA is extremely concerned that EPA/AIEO is unilaterally considering changing the composition of the organizations. It would be inappropriate for the EPA/AIEO to interfere with the organizations, TPGs, RTOCs or NTC in any way. First, there is no reason to, and second, after listening to all the calls and speaking with AIEO, not once has NTAA heard anyone ask for any of these changes.

Recommendations:

1. Direct Communication: The NTAA recommends that all communications come from the NTC Chair and NTC Representatives in the future if there are any issues. The NTAA believes that direct communication between organizations is the best way to address issues and resolve problems that may arise.
2. The NTAA would like for the EPA/AIEO and the NTC to respect that NTAA is a Tribal Air Policy organization working to promote Tribal Air Quality programs and policy matters. Air quality involves specialized and technical knowledge, information, and ingenuity.

In closing, while the NTAA looks forward to continuing to work with EPA/AIEO in protecting Tribal Air Quality as well as public health in American Indian and Alaska Native communities, the NTAA would like to note that this review could have been handled better if EPA were to better explain the purpose of this effort to the Tribes and what issues EPA is trying to address by conducting this review.

If you have any questions, please feel free to contact Marty Johnson, NTAA Program Coordinator, at Marty.Johnson@nau.edu.

Respectfully,

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Chair
National Tribal Air Association

Cc: Lee Zeldon, Administrator, USEPA
Aaron Szabo, Assistant Administrator, OAR
Abigale Tardif, Principal Deputy Assistant Administrator, OAR
Elizabeth Shaw, Deputy Assistant Administrator for Management, OAR
Usha Turner, Assistant Administrator, OITA
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Tabitha Langston, NTC Chair
Sharri Venno, R1 RTOC Tribal Co-Chair
Shavonne Smith, R2 RTOC Tribal Co-Chair
Dana Adkins, R3 RTOC Tribal Co-Chair
Jerry Cain, R4 RTOC Tribal Co-Chair
Brandy Toft, R5 RTOC Tribal Co-Chair
Joseph Abeyta, R6 RTOC Tribal Co-Chair
Alisha Bartling, R7 RTOC Tribal Co-Chair
Jason Walker, R8 RTOC Tribal Co-Chair
Roman Orona, R9 RTOC Tribal Co-Chair
Raymond Paddock, III, R10 RTOC Co-Chair
Pat Childers, Senior Advisor, Tribal Program Manager, OAR
Marty Johnson, Program Coordinator, NTAA
Nicolette Cooley, Director, ITEP

Attachment 1: Chart

