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February 26, 2015

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U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC)
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Attention Docket ID No. OAR-2008-0699
1200 Pennsylvania Ave., NW
Washington, DC, 20460

Subject: Proposed Rule for National Ambient Air Quality Standards for Ozone

Introduction

The National Tribal Air Association (NTAA) is pleased to submit these comments regarding the U.S. Environmental Protection Agency's (EPA)'s proposed rule for ozone, 79 Fed. Reg. 75234 (December 17, 2014) (Proposal).

The NTAA is an autonomous organization with 92 principal 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 Indian 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 organization always seeks to represent consensus perspectives on any given issue, it is important to note that the views expressed by the NTAA may not be agreed upon by all Tribes. Further, it is also important that EPA understands interactions with the organization do not substitute for government-to-government consultation, which can only be achieved through direct communication between the federal government and Indian Tribes.

The NTAA strongly supports the regulatory actions outlined in the Proposal which would serve to strengthen the current National Ambient Air Quality Standards (NAAQS). The updated primary and secondary standards for ground-level ozone under the Proposal will improve public health and better protect public welfare. The new, more conservative ozone standards outlined in the Proposed Rule are supported by a very large number of studies on the effects of ozone on human health and public welfare, and a great deal of information has become available for evaluation since EPA last revised the ozone NAAQS in 2008. The proposed standards have been reviewed extensively by the Clean Air Scientific Advisory Committee (CASAC), an independent scientific review committee, which

recommends revising the ozone NAAQS by lowering the existing standards even lower than standards put forth by the EPA in the Proposed Rule. The Proposed Rule notes that since 2008, EPA has prepared several important reviews of the scientific studies, including the Integrated Science Assessment (ISA), the Health Risk and Exposure Assessment (HREA), and the Policy Assessment for the Review of the ozone NAAQS (PA).¹ Based on all the scientific, epidemiological, and human exposure studies, EPA's PA, prepared by the EPA Office of Air Quality Planning and Standards, demonstrates unequivocally that the existing primary ozone NAAQS is not sufficiently protective of human health and public welfare.

EPA assessments, which reviewed thousands of studies, evaluated the effects of ground-level ozone on vegetation and on the public welfare, and conclude that the current secondary ozone standard is not sufficiently protective of the public welfare. We support EPA's proposed decision based on the evidence, that it is appropriate, in accordance with section 109(d) (1) of the Clean Air Act (CAA), to revise the current NAAQS for ozone in order to adequately protect human health and public welfare. The Proposal clearly demonstrates that the current primary and secondary standards do not meet the Clean Air Act (CAA) requirements at section 109(b) (1) and (2) that EPA must set a primary and secondary NAAQS at a level of air quality that is requisite (necessary) to protect public health, with a margin of safety, and public welfare from adverse effects. The NTAA prefaces its comments and recommendations by briefly summarizing the effects of ozone and advising EPA about the effects of ground-level ozone on Native American and Alaska Natives.

The Effects of Ozone

Thousands of studies, as summarized in the Proposal, have shown that breathing air that contains ozone can cause serious human health effects from both short-term and long-term exposures. Exposure to ozone can harm the respiratory system (the upper airways and lungs), aggravate asthma and other lung diseases, and cause premature death from respiratory and cardiovascular causes. The studies summarized in the Proposed Rule describe the "at risk population," those people who are among the most vulnerable to ozone-related health effects, to include children, older adults, people with asthma and other lung diseases, and people who are active outdoors, especially outdoor workers. There are many studies cited in the Proposal which show that exposure to ozone can lead to increased use of medication, school absences, and increases in respiratory-related hospital admissions and emergency room visits, especially for asthma aggravations. The Proposed Rule describes how many studies show significant harmful human health effects at ozone levels that meet and are below the current primary 8-hour standard of 75 parts per billion (ppb). The "at-risk population" of persons with asthma is particularly affected at the present NAAQS standard for ozone. EPA's Fact Sheet "Ozone and Health" states that: "An estimated 25.9 million people have asthma in the U.S., including almost 7.1 million children. Asthma disproportionately affects Puerto Ricans, Native Americans/Alaska Natives and African Americans."²

Ground-level ozone has been shown by numerous studies to adversely affect public welfare, which includes impacts on vegetation, ecosystems, and their associated services. The

¹ <http://www.epa.gov/ttn/naaqs/standards/ozone/data/20140829pa.pdf>

² <http://www.epa.gov/airquality/ozonepollution/pdfs/20141125fs-health.pdf>

studies summarized in the Proposal describe how ground-level ozone at levels below the current secondary standard cause visible foliar injury to plants and trees, loss in forest growth and in the biomass of trees, and crop yield loss. The PA notes that EPA's Integrated Science Assessment concluded that controlled studies "have clearly shown that exposure to ozone is causally linked to visible foliar injury, decreased photosynthesis, changes in reproduction, and decreased growth" in many species of vegetation.³ Visible foliar injury is a visible bio-indicator of ozone exposure in plant species, with the injury affecting the physical appearance of the plant. The Proposed Rule recognizes that public lands have been set aside to provide benefits to the public welfare, such as national parks and forests, which must be protected to preserve the scenic value, the natural vegetation, and wildlife within those areas. States, Native American Tribes, and public interest groups have set aside areas that are intended to provide similar benefits to the public welfare. In addition, many areas of great value to Native American Tribes and their members provide important benefits to Tribes with treaty rights that preserve hunting, fishing, and gathering rights on lands in the Tribes' usual and accustomed areas. The studies and information described in the Proposed Rule clearly show harmful effects to the public welfare from ozone at levels at and below the current secondary standard of 75 ppb.

Native American Tribes and the Effects of Ozone

Native American Tribes and their Tribal members are disproportionately susceptible to the health effects of ozone. Exposure to ozone can adversely affect Tribal community members including children, Tribal elders, members with asthma, and others who gather and use plants of cultural significance. The fact that the Proposed Rule concludes that these people are "at risk" from ozone in the air they breathe at levels that are below the current primary NAAQS standard for ozone is of great concern to the NTAA. The NTAA is also greatly concerned that the Proposed Rule, supported by the PA and the CASAC, concludes that the elements of public welfare include a large number of plant species of cultural significance to Tribes, which are adversely affected by ozone pollution levels well below the current secondary NAAQS standard.

Several studies show that Native Americans and Alaska Natives have a disproportionate incidence of asthma and are at risk from exposure to ozone. EPA explains that a recent report by the Centers for Disease Control and Prevention (CDC) found that asthma affects almost 12 percent of people living in Tribal communities — nearly double the current national average of 7 percent. Managing triggers (in this case exposure to ozone) is especially important for Tribal communities who are disproportionately affected by asthma.⁴ The same EPA fact sheet writes that Native American children suffer from asthma at a level almost twice that of the general U.S. population. A report by the Department of Health and Human Services (HHS) writes that in 2011, 279,000 American Indian/Native American adults reported that they currently have asthma.⁵ The same HHS fact sheet, citing a 2012 summary of statistics by the CDC, writes that 14.3% of Native Americans and Alaska Natives had been diagnosed as having asthma. This information shows that it is very important to the NTAA that the primary ozone NAAQS, last set in 2008, must be revised as described in the Proposed Rule to adequately protect human health in Tribal communities and throughout the nation.

³ U.S. EPA 2013, p. 1-15

⁴ <http://www.epa.gov/iaqtribal/triggers.html>

⁵ <http://minorityhealth.hhs.gov/omh/browse.aspx?lvl=4&lvlid=30>

As noted above, the cultural identity of Native American Tribes and their members continue to be deeply rooted in the natural environment. The adverse effects of ozone on sensitive vegetation and trees species has the potential to directly impact the traditional cultural practices and lifeway's of Native Americans who use those plant species for subsistence, medicines, and other traditional practices. Appendix 5A of the PA, described in section 6.4.2 of the PA, provides a listing of thirty (30) known ozone-sensitive plant species to which Tribes ascribe cultural significance. The PA at page 5-18 states that, "Locations where these species are growing and are used by tribes to support cultural practices would thus be potentially vulnerable to impacts from elevated cumulative ozone exposures, which could result in the loss of those associated cultural services." NTAA is concerned that at the current ozone standard, many plants of importance to Tribes for cultural and subsistence practices will be damaged or disappear on lands under their control, thus adversely affecting public welfare. NTAA strongly supports the Proposal to strengthen the secondary NAAQS for ozone in order to better protect the culturally significant plant species.

The result of the adverse effects on plants and trees also implicates the risks posed to human health from the current primary NAAQS for ozone. The health of Native Americans and Alaska Natives who practice their traditions of gathering plants for subsistence and cultural purposes results in more exposure to ozone in the air they breathe. In many places, Native Americans and Alaska Native elders have had to travel farther to gather the culturally significant, ozone-sensitive plant species. This means that the health of those elderly Tribal members who are gathering plants of cultural import is at greater risk, since as noted in the Proposed Rule, elderly adults are particularly vulnerable to ozone-related health effects. Another concern is that Tribal members who spend time outside gathering traditional plants may be disproportionately impacted by ozone pollution given that, as noted in the Proposed Rule, those who are active outdoors are more vulnerable to the adverse health effects of ozone at levels below the current primary standard for ozone.

Revise the Current Primary Standard

EPA seeks comment on the proposed decision to revise the current primary NAAQS for ozone. After reviewing the Proposal and related materials such as the CASAC report and the PA concerning the adverse human health effects from ground-level ozone at and below the current primary NAAQS of 75 ppb, the NTAA strongly supports the Administrator's proposed decision to revise the current primary standard for ozone.

Adopt a Primary Standard, No Higher than 65 ppb

EPA seeks comment on the proposal to revise the primary ozone standard to within the range of 65 to 70 ppb. Based on the thousands of studies of human health effects from exposure to ozone that are summarized in the Proposal, the CASAC report and the PA, the NTAA urges the Administrator to revise the primary standard to at least the level of 65 ppb, the lowest level proposed. Alternatively, NTAA recommends that EPA further review the available studies and evaluations of health effects to at-risk populations, and revise the primary ozone NAAQS to 60 ppb.

We are troubled by the fact that both the CASAC, the HREA, and the PA⁶ recommend setting the primary standard to a level of 60 ppb, and yet the Proposed Rule does not reflect this standard. CASAC has advised EPA that exposures at or below 60 ppb is an appropriate level for protecting people, including children, with asthma.⁷ As noted above, we are concerned that asthma disproportionately affects Native Americans and Alaska Natives, and recommend revising the primary ozone standard as low as 60 ppb as authorized by the CAA. We are also concerned that Native Americans and Alaska Natives spend a lot of time outdoors. We understand that NAAQS are not meant to be zero-risk standards, yet we feel that the EPA is not providing sufficiently protective standards as outlined in the Proposed Rule. A level of 60 ppb corresponds to the lowest exposure concentration that would minimize severe lung function decrements and reduce the risk of respiratory mortality, but not stop those affects to the at-risk population. Even at 60 ppb, the studies and reports conclude that some asthmatic children would continue to suffer from exposures to ozone at that level, and reduce, but not end, the number of deaths associated with short-term exposures.

The Administrator explains of the reasons why EPA's proposal does not propose a range of 60 - 70 ppb, and that a revised primary standard at a level of 65 ppb will protect almost all children and will significantly reduce lung function decrements and respiratory affects. For that reason, NTAA supports the Proposal to revise the primary ozone NAAQS to 65 ppb, the lowest level proposed. However, we request that the EPA revisit its conclusion and give serious consideration to revising the primary standard to 60 ppb.

We support but have no comments on EPA's proposal for how the ozone standard will be measured.

Revise the Current Secondary Standard

EPA seeks comment on the proposed decision to revise the current secondary NAAQS for ozone. After reviewing the Proposal and related materials on public welfare, such as the CASAC report, the PA, and EPA's ISA and WREA analyses of air quality, exposure and ecological risks from ground-level ozone at and below the current secondary NAAQS of 75 ppb, the NTAA strongly supports the Administrator's proposed decision to revise the current secondary standard for ozone.

Adopt a Secondary Standard No Higher than 65 ppb

EPA seeks comment on the proposal to revise the secondary ozone standard to within the range of 65 – 70 ppb to provide increased protection against vegetation-related effects on public welfare. After reviewing the Proposal's summary of all the studies that have been completed in the past and since the 2008 revision of the secondary NAAQS for ozone, the NTAA supports the proposal and urges the Administrator to revise the secondary standard to at least the level of 65 ppb, the lowest level proposed.

⁶ The PA approach is presented and discussed in the Proposal at 79 FR 75295 - 75303

⁷ CASAC Advice is reviewed in the Proposal at 79 FR 75286 – 75291.

NTAA requests that EPA review its decision to not revise the secondary standard to 60 ppb, as was recommended by CASAC and the PA.⁸ As noted above, NTAA is very concerned about the effects of ground-level ozone on plant species which are of cultural importance to Native American Tribes and their members, and we want the secondary standard to be revised at the lowest level discussed in the Proposal, consistent with the CAA.

We recommend that EPA adopt the most protective method of monitoring. The Proposal concludes that adopting a W16 index value, averaged across three consecutive, would provide the requisite protection against known or anticipated adverse effects to the public welfare. We note that the CASAC and the PA recommend a one year form as compared to the proposed three year forms. The CASC wrote “[t]he CASAC does not recommend the use of a three-year averaging period.”⁹ PA noted evidence of some ozone effects on perennial species that may result from a single season’s elevated ozone exposures may “carry over” effects on plants in the subsequent season, and that multiple consecutive years of critical ozone exposure may result in larger impacts on forested areas. The PA concludes that adverse effects to public welfare that occur as a result of three-year ozone exposure are potentially greater than those associated with a single year of such exposure. The NTAA requests that EPA review the decision of whether to establish a one year averaging form as a more protective way to evaluate the results of ozone monitoring.

Implementation

The Proposal describes the approach for States to implement the revised ozone NAAQS with the publication of new guidance and by addressing difficult issues, such as how to handle Prevention of Significant Deterioration (PSD) permit applications that are pending. Most of the discussion in the Proposal concerns how EPA will work with States as the States monitor air quality and make recommendations whether EPA should designate an area as in attainment of the NAAQS or in non-attainment. The final revision of the ozone NAAQS will trigger a process under which state and local agencies make recommendations to EPA regarding area designations, prepare State Implementation Plans (SIP) revisions to address how to attain and maintain the new ozone NAAQS for EPA approval, and will require many changes to the current requirements in how the NAAQS standard will be implemented.

However, the Proposal does not mention that EPA must promulgate a revised implementation rule as it adopts a revised ozone standard, as it is doing for the 2008 ozone NAAQS. EPA is just now in the process of publishing a final rule “Implementation of the 2008 NAAQS for Ozone: State Implementation Plan Requirements” (Implementation rule), signed by the Administrator on Feb. 13, 2015.¹⁰ This new Implementation rule, which will have to be updated when EPA promulgates the revised ozone NAAQS, addresses a number of significant topics that will be important to implement in all areas to attain the ozone NAAQS. Topics in the new Implementation rule include attainment dates for different areas, anti-backsliding measures, new source review, requirements for reasonable further progress, requirements of reasonably available control technology, emission inventory requirements, permit requirements, and state

⁸ The PA recommendations on are discussed in the Proposal at 79 FR 75339 – 75338.

⁹ The CASAC and PA positions and concerns is discussed at 79 FR 75338

¹⁰ www.epa.gov/airquality/ozonepollution/pdfs/20150213fr.pdf

and federal operating permit programs requirements. There is also the need to revise EPA's Exceptional Events rule.¹¹ NTAA is concerned that the Proposal did not mention the need to update these important rules.

NTAA notes the Proposal writes that EPA regulations and guidance are clear that Tribes are not required to follow the process that States are responsible for completing under Sec. 107 of the CAA. NTAA is concerned that very little discussion is presented in the Proposal about how the designation process will proceed for Native American Tribal lands and reservations and how implementation plans will be developed. The Proposal notes that section 107 of the CAA specifically addresses the responsibility of states to submit implementation plans for the state.¹² The Proposal then writes that EPA intends to follow the same process for Tribes pursuant to section 301(d) of the CAA which authorizes EPA to treat Indian Tribes as States, pursuant to regulations that were promulgated in the Tribal Authority Rule.¹³

NTAA is disappointed that the Proposal does not include more discussion of how a revised ozone NAAQS will be implemented in Indian Country. State Implementation Plans and designations cannot address Native American reservation lands and land under the jurisdiction of a Tribe. Therefore, the Tribe may choose to step forward to seek TAS, to monitor ozone, and to recommend to EPA whether the area is in attainment or non-attainment, and prepare a Tribal Implementation Plan. However, the Tribal Authority Rule is clear that the Tribe is not required to do so, unlike the requirements in section 107 of the CAA that States have the responsibility to take certain proscribed action. If a Tribe does not choose to take on those responsibilities, the CAA is clear that EPA must make designation decisions for the Tribal areas¹⁴ not covered by an approved SIP. EPA's consultation policies require that such attainment and designation decisions it makes must be done in consultation with the affected Tribe. EPA issued a memorandum in 2011 that is referenced in the Proposal on in Footnote 253 "Guidance to Regions for Working with Tribes during the National Ambient Air Quality Standards (NAAQ) Designations Process."¹⁵ EPA also issued a policy memorandum in 2011 titled "Policy for Establishing Separate Air Quality Designations for Areas of Indian Country."¹⁶ These guidance and policy memoranda provide a great deal of detail about how EPA will consult with and work with Tribes during implementation of the NAAQS. The detail in these documents show that Tribes will be expected to participate in the air quality monitoring and designation process, and in developing implementation plans.

NTAA recommends that EPA initiate training for EPA Regional offices and for Tribes about the choices and procedures described in these documents. We also recommend that EPA include a full description of the policies and guidance for implementing the revised NAAQS in the preamble to the final rule to revise the NAAQS for ozone. NTAA strongly urges EPA to move swiftly to promulgate a revised Implementation rule after adopting a revised ozone standard, and not take 6 years to do so as is the case with the 2008 ozone NAAQS.

¹¹ 72 FR 13560 (March 22, 2007).

¹² 79 FR 75375.

¹³ 63 FR 7254, February 12, 1998.

¹⁴ Sec. 107(d)(1)(B)(ii) and Sec. 107(d)(4)(A)(ii).

¹⁵ Available at <http://www.epa.gov/ttn/oarpg/t1/memoranda/20120117naaqsguidance.pdf> and is also available at <http://www.epa.gov/ozonedesignations/2008standards/documents/20120117naaqsguidance.pdf>.

¹⁶ Available at http://www.epa.gov/air/tribal/pdfs/0067_001.pdf

Environmental Justice

Executive Order (EO) 12898 establishes federal executive policy on environmental justice.¹⁷ Its main provision directs federal agencies, to the greatest extent practicable and permitted by law, to make environmental justice part of their mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies and activities on minority populations and low-income populations in the U.S. The Proposed Rule must fulfill the intent of EO 12898 in which Section 6-606 provides that the EO applies to Native American programs.

On July 24, 2014, the Environmental Protection Agency (EPA) released a new “EPA Policy on Environmental Justice for Working with Federally Recognized Tribes and Indigenous Peoples.”¹⁸ By establishing this policy, EPA more formally recognizes its special relationship with Native American Tribes than had EO 12898. This new policy recognizes the strong connection many federally recognized Tribes and indigenous peoples have to the environment and their past and present role in the protection and sustainability of the environment and public health. One of the principles in this new policy is: “The EPA uses legal authorities, as appropriate, to advance environmental justice goals in its work throughout the United States, including in Indian country.”

The Proposal evaluates how the proposed revisions to the ozone NAAQS comply with the principles of environmental justice.¹⁹ EPA writes that it believes the human health or environmental risk addressed by the Proposal will not have potential disproportionately high and adverse human health or environmental effects because as a Proposed Rule, it does not affect the level of protection provided to human health or the environment. The Proposal states that if the proposed revisions are finalized, the revised ozone NAAQS will increase public health protection.

NTAA believes that revising the ozone NAAQS by lowering the primary and secondary standards will reduce the risks posed by ozone to public health and public welfare. However, our comments on the levels that EPA proposes to set the revised primary and secondary standards articulate our concern that even the lowest level of 65 ppb that is proposed will still result in a disproportionate impact on Native Americans and Alaska Natives with asthma. NTAA comments that EPA should revise the primary and secondary ozone standards to 60 ppb. By setting the lowest standard consistent with the CAA, EPA will comply with its environmental justice policies to better protect Native American Tribes and people in their communities. Therefore, NTAA recommends that EPA review its proposed decisions and complete a thorough environmental justice analysis to ensure that the final revised NAAQS for ozone will result in the best protection to the health and public welfare of Tribes and indigenous peoples.

¹⁷ Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (February 11, 1994), at

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws/EXO12898.

¹⁸ <http://www.epa.gov/environmentaljustice/resources/policy/indigenous/ej-indigenous-policy.pdf>

¹⁹ 79 FR 75387

Tribal Consultation

EPA writes that the Proposal “does not have tribal implications as specified in Executive Order 13175.”²⁰ The rationale for EPA’s finding is that the Proposal “does not have a substantial direct effect on one or more Indian Tribes as Tribes are not obligated to adopt or implement any NAAQS. In addition, Tribes are not obligated to conduct ambient monitoring for ozone or to adopt the ambient monitoring requirements of 40 CFR part 58.” The NTAA finds that EPA does not understand fully the intent behind EO 13175, as it is not limited to federal actions with financial impacts to Tribes. Specifically, section 1(a) of EO 13175 defines “policies that have tribal implications” as:

[R]egulations, legislative comments or proposed legislation, and other policy statements or actions that have substantial direct effects on one or more Indian tribes, on the relationship between the Federal Government and Indian tribes, or on the distribution of power and responsibilities between the Federal Government and Indian tribes.²¹

The definition makes no reference to direct compliance costs on Tribal governments although such costs are one of many implications that revising the ozone NAAQS could have on Tribes. NTAA notes that our comments on Implementation of a revised ozone NAAQS, implementing the revision may very well result in costs to Native American Tribes whose lands must be designated as in attainment or non-attainment. Either the Tribes or EPA will have to bear the costs of air quality monitoring and preparing implementation plans, and the costs to Tribes of participating in the process may be significant.

The NTAA finds that the Proposed Rule has implications to Tribes and their members as described in our comments that request EPA adopt a level of 60 ppb for the revised ozone NAAQS. NTAA is concerned that revising the NAAQS at a higher level will result in continued disproportionate impacts to the health of Native Americans and Alaska Natives, and to the public welfare, thus affecting the Tribes and which has a potential effect on Tribal treaty rights.

EO 13175 requires EPA to develop an accountability process to ensure “meaningful and timely input by development of regulatory policies that have tribal implications.” The EPA Policy on Environmental Justice for Working with Federally Recognized Tribes and Indigenous Peoples described above includes a number of principles which EPA must follow, including:

The EPA consults with federally recognized tribes and provides meaningful involvement opportunities for indigenous peoples throughout the United States and others living in Indian country, and considers the potential impact of Agency actions that may affect their human health or environmental interests.

NTAA recognizes that in the Proposal, EPA writes of its intent to conduct outreach consistent with the EPA Policy on Consultation and Coordination with Tribes. EPA writes that it

²⁰ *Id.* at 75386.

²¹ Executive Order 13175, Consultation and Coordination with Indian Tribal Governments (November 9, 2000), at <http://www.epa.gov/fedrgstr/eo/eo13175.htm> (last visited on August 29, 2014).

intends to offer formal consultation to the Tribes during the public comment period when the final revised ozone NAAQS is published. NTAA very much appreciates that EPA's Proposal, in its review of EO 13175, discusses plans to confer with Tribal environmental professionals by way conference calls that are sponsored by NTAA, to provide information about the NAAQS revision. We also request that EPA to plan face-to-face meetings with Tribal environmental professionals and prepare materials for webinars. Finally, during the comment period on a final ozone NAAQS revision, we request that EPA consider additional hearings in locations nearer to Tribal communities so Tribes and their members have more equitable access to receive information and provide comments.

Conclusion

In summary, the NTAA is pleased to provide the aforementioned comments and recommendations concerning the Proposal to revise the NAAQS for ozone.

On Behalf of the NTAA Executive Committee,

A handwritten signature in black ink, appearing to read "Bill Thompson", is centered below the text "On Behalf of the NTAA Executive Committee,".

Bill Thompson, Chairman, NTAA