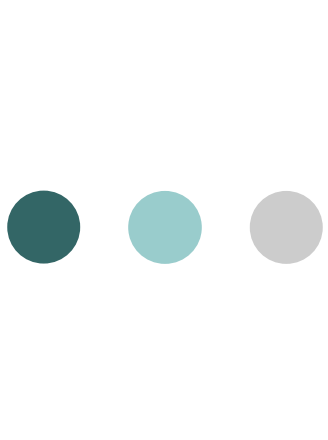


National Tribal Air Association's Policy Work on NAAQS

Andy Bessler
Project Director
National Tribal Air Association





NTAA provided Tribes with
Policy Analysis on the last
round of NAAQS revisions
for ground-level ozone in
2015



What is Ozone?

- Photochemical oxidant produced by reactions between NO_x and a wide variety of VOCs, e.g. motor vehicle exhaust, oil refining, printing, petrochemicals, aviation, etc.
- Ground-level O₃ creates smog
- The chemical reactions to create O₃ may occur downwind of NO_x and VOC sources



The Health Effects of Ozone

- O₃ exposure can harm the respiratory system, aggravate asthma/lung diseases, & cause premature death
- The “at risk population” includes children, people with asthma & other lung diseases, older adults, and people who are active outdoors
- O₃ exposure can lead to increased use of medication, school absences, and increases in respiratory-related hospital admissions and emergency room visits



Ozone Effects to Public Welfare

- Multiple studies demonstrate O_3 concentrations at levels below current secondary standard adversely affects public welfare
- Injury to vegetation, to forests by loss in tree growth and biomass, to ecosystems, and lower crop yield



Effects of O₃ on Native Americans and Alaska Natives (NA/AN)

- Native Americans are disproportionately susceptible to health effects from O₃
- Studies show that asthma affects NA/AN at a rate nearly double that of the general population
- Studies also show that NA/AN children suffer from asthma at a significantly higher rate than the general U.S. population



Ozone-Sensitive Plants Used By Tribes

- EPA's Policy Assessment for the Review of the Ozone NAAQS includes an Appendix listing 30 O₃ sensitive plant species of cultural significance to Tribes
- O₃ pollution has the potential to directly impact the cultural practices and lifeways of Native Americans who use those plant species for subsistence, medicines, & other traditional practices
- EPA's Policy Assessment recommends revising the primary and secondary O₃ standards to 70 to 60 ppb





NTAA's Policy Work on NAAQS

- In 2015, NTAA produced a Policy Response Kits (PRK) for Tribes to provide meaningful comments to EPA regarding these NAAQS revisions.
- A NTAA PRK will include:
 - The official NTAA comment letter
 - A Tribal Template letter for Tribes to use to submit comments based on the NTAA comment letter
 - A basic fact sheet to share with Tribal leadership
 - Often times, an information webinar will be held for Tribes.

NTAA's Policy Work on NAAQS

NTAA's PRK can be found on NTAA's website:

www.ntaatribalair.org



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NTAA: Policy Response Kits

Policy Response Kits Home

Current US EPA & Federal Agencies Actions ▾

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Policy Response Kits

These Policy Response Kits (PRK) linked below were crafted to alert NTAA Member Tribes and other Tribal Air Offices about important U.S. EPA & Federal Agencies proposed rules and provide tools for Tribes to use in submitting informed comments on U.S. EPA actions. PRK's include summary pages, official NTAA comments and a Tribal template letter for Tribes to use in submitting their own comments.

The NTAA EC directed staff to craft and release Policy Response Kits on these current U.S. EPA & Federal Agencies actions:

➤ [California Tribal Gasoline Permits: Gasoline Dispensing Stations \(GDF\)](#) NTAA is urging Tribes in the state of California to comment on the EPA's General Air Quality Permit for new and modified minor stationary source gasoline dispensing facilities (GDF) in certain areas of Indian Country. The permit is proposed by EPA to develop a uniform set of requirements based on local air quality conditions that are unique to the State of California. The permit will provide a way to streamline permitting processes under the Federal Indian Minor Source Review (NSR) program. For more information, refer to the CA GDF General Permit Public notice at <https://www.regulations.gov/document?D=EPA-R09-OAR-2016-0580-0005>. Comments are due into EPA Region 9 by January 31st, 2017.

Below are links to previous NTAA Policy Response Kits on U.S. EPA & Federal Agencies actions in which the public comment period is now closed:

➤ [Clean Energy Incentive Program](#) Comments are due to EPA on November 1st, 2016 on EPA's proposed Clean Energy Incentive Program (CEIP). The CEIP was developed as part of the EPA's Clean Power Plan (CPP) as a mechanism to encourage early investment in zero-emitting renewable energy generation to help achieve CPP goals. The court-ordered stay of the CPP allows states to continue planning efforts, and the

NTAA
PO Box 15004, Flagstaff, AZ 86011-5004
Phone: (928) 523-0526
Fax: (928) 523-1266
Andy.Bessler@nau.edu