**National Tribal Air Association (NTAA) Template Letter on**

**Tribal Letter to USEPA – response to Janet McCabe Invitation of 10/28/22 regarding IRA**

*NOTE —* *NTAA recommends that you begin your Tribe’s comment letter with introductory remarks regarding the signatory’s position with the Tribe. The more individualized the letter, the greater its potential impact. Feel free to add your own arguments or specific stories that will make this educational for the EPA. Be sure to replace all the highlighted text with your own text. The comment deadline is December 27, 2022. Your comment letter can be submitted via email to Pat Childers at* *childers.pat@epa.gov*

[Date]

Janet G. McCabe
Deputy Administrator
U.S. Environmental Protection Agency
Washington, DC 20460

Subject: Invitation “…to collect input from tribes, based on the general program requirements authorized by the Inflation Reduction Act.” Letter of October 28, 2022

Dear Administrator McCabe:

The Inflation Reduction Act (IRA) creates considerable potential to mitigate climate change and to address other serious threats to our health and environment. We appreciate your recent invitation to provide comments and to address the questions you posed in your letter of October 28, 2022. Your agency has a significant role in the implementation of this important law. Our people, lands, and culture look forward to the many benefits the IRA may bring.

**[Insert Tribal Name Here**] has reviewed the information provided in the enclosure to your invitation letter. We continue to acquire additional information about the IRA and its potential to support our Tribe’s interests. This letter reflects our current understanding of this major legislation. We look forward to continuing communications with EPA and others as programs develop.

Impacts and Threats of Climate Change

As noted by President Biden, Administrator Regan and others, the IRA can be the most effective law in our nation’s history in advancing technologies and implementing programs to reduce greenhouse gases and mitigate the impacts of climate change. The real and projected effects of climate changes are of great concern. **[Insert Tribal Name Here**]is eager to participate in relevant programs that will address these concerns.

*INSERT PARAGRAPH if your tribe has an example of climate impacts or concerns such as agriculture/crops, drought, floods, lifeways,…*

We ask that EPA consider these and articulate the anticipated benefits as each of the IRA programs is implemented.

Building Our Capacity

The resources allocated in the IRA provides an unprecedented opportunity to enhance our capability to address air quality as well as climate challenges. We look forward to the potential to address the acute effects of air pollution on the health of our people. Indoor air pollution presents direct threats in our homes and public spaces. Wildfires and other sporadic pollution–causing events contribute to elevated cases of asthma and other respiratory diseases. Better preparedness and innovative mitigation measures are essential. To advance our efforts, we must access the necessary resources. These initiatives must begin with efficient program plans followed by effective implementation.

The **[Insert Tribal Name Here**] is actively assessing the many IRA initiatives to be administered by EPA and the other responsible agencies. We appreciate your agency’s efforts to clarify the many complexities of this law, and request that you continue to provide direct assistance as the specific initiatives evolve. Preparing applications for grants, cooperative agreements, or any written mechanism for seeking funds often is time and labor intensive. As we identify good opportunities to address specific needs, we request that you utilize a resource allocation process that is both expeditious and recognizes these challenges.

Concurrent with program planning, we anticipate hiring personnel, retaining contractors, and acquiring supporting resources. Some IRA initiatives recognize and allocate resources for this important up - front work to be performed. While recognizing the aggressive schedules for IRA program execution, we will require sufficient time to optimize each program’s effectiveness. Our process of hiring and retaining personnel requires time and effort that others may not experience. We also recognize the necessity to allocate professional time for training and education of new employees. This is particularly evident in the specialized fields of science, engineering, and finance.

Non-profit Organizations (*OPTIONAL SECTION)*

The structure of several of the EPA IRA programs, such as the Greenhouse Gas Emission Reduction Fund and the Environmental and Climate Justice Block Grant Program, effectively requires Tribes to partner with non-profits, community financial institutions or other community organizations to develop and implement planning, programs and technology projects funded through the IRA. The new and innovative approach these programs represent, however, make it incumbent on EPA to support Tribes in their efforts to identify and develop appropriate partnerships. EPA, for example, should sponsor webinars and other technical assistance to bring potential partners - such as Native CDFIs and Native non-profits - to the table with Tribes to discuss the types of planning, programs, and projects eligible for funding. The EPA should also seek to engage other federal agencies for examples and support for efforts to promote partnerships between Tribes and non-profits, such as the new Interagency Community Investment Council and the DOI Office of Strategic Engagement.

Flexibility

**[Insert Tribal Name Here**] greatly appreciates your pro-active actions to engage Tribes in the exciting prospects afforded by the Inflation Reduction Act. The IRA initiatives have significant potential to improve our health, environments, and lifeways. To realize this potential, we encourage EPA to exercise maximum flexibility and discretion in allocating IRA resources

Sincerely,

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Cc: Pat Childers, Senior Tribal Program Coordinator, OAR