**NTAA Template Letter for Tribes on the PROPOSED DECISION: REVIEW OF THE SECONDARY NATIONAL AMBIENT AIR QUALITY STANDARDS FOR OXIDES OF SULFUR, OXIDES OF NITROGEN AND PARTICULATE MATTER.**

**NOTE****:** *The**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.*

*The comment deadline is* ***June 14, 2024.***  *Your comment letter can be submitted electronically to the Federal Rulemaking Portal.* <https://www.regulations.gov/> OR email to [a-r-Docket@epa.gov](mailto:a-r-Docket@epa.gov), Docket No. ID EPA-HQ-OAR-2014-0128.

[DATE]

Honorable Administrator Michael S. Regan

U. S. Environmental Protection Agency

Docket Center, OAR

Mail Code 28221T

1200 Pennsylvania Avenue NW

Washington, DC 20460

Re: **[INSERT TRIBE’S NAME HERE]** comments on the Proposed Decision: Review of the Secondary National Ambient Air Quality Standards for Oxides of Sulfur, Oxides of Nitrogen and Particulate Matter, Docket ID EPA-HQ-OAR-2014-0128

Dear Honorable Administrator Regan,

The **[INSERT TRIBE’S NAME HERE]** is pleased to submit this letter to provide comments on the U.S. Environmental Protection Agency’s (EPA) proposed decisions to revise the secondary National Ambient Air Quality Standards (NAAQS) for oxides of sulfur (SOx) and to retain the secondary standards for oxides of nitrogen (N oxides) and particulate matter (PM).

**[INSERT TRIBE’S NAME HERE]** supports the need for on-going review of the secondary standards, since the secondary standards look to protect public welfare, such as ecosystems, vegetation, and visibility. The secondary standards can also play an important role in protecting vulnerable cultural resources for Tribes. For example, emissions of SO2 transforms to sulfuric acid and can lower the PH of water bodies such as rice lakes and can impact the health of these ecosystems. The lower PH also contributes to mobilization of mercury making it more bioavailable and can make subsistence and cultural fishing practices unavailable to Tribal members. Additionally, excess NOx deposition acts as a fertilizer in aquatic ecosystems and causes eutrophication of lakes, streams, algal blooms and oxygen decreases in these systems which can lead to fish die offs and other impacts.

**[INSERT TRIBE’S NAME HERE]** also believes the changes in the proposed secondary standard will provide additional support to the Forest County Potawatomi Tribes that have Air Quality Related Values for their Class I redesignation to protect against SO2 deposition. [Add specific examples of important vegetation or aquatic resources that could be impacted in your area of Indian country]

**[INSERT TRIBE’S NAME HERE]** is supportive of the proposal for:

* *Oxides of Sulfur* – **[INSERT TRIBE’S NAME HERE]** supports the EPA to:
  + The current short-term secondary SO2 standard (3-hour standard set at 500 parts per billion (ppb), not to be exceeded more than once per year) is inadequate.
  + Revise the existing secondary SO2 standard to an annual standard with a level within the range of 10 - 15 ppb, averaged over 3 years.
  + **[INSERT TRIBE’S NAME HERE]** supports any alternatives, including an annual SO2 standard level as low as 5 ppb, revising the secondary SO2 standard to be identical to the primary SO2 standard in all respects, that can be supported by the current science.
  + **[INSERT TRIBE’S NAME HERE]** supports retaining the existing 3-hour standard in addition to the proposed new annual secondary standard, because in the past, the three-hour standard was the controlling standard for many areas. Retaining this standard would ensure those areas maintain adequate protections.
* *Oxides of Nitrogen* – **[INSERT TRIBE’S NAME HERE]** supports the EPA to:
  + Retain the existing NO2 standard (annual average of 53 ppb).
  + Revise the annual NO2 standard to a level of 35-40 ppb, averaged over 3 years, as supported by the scientific evidence.
* *Particulate Matter* – **[INSERT TRIBE’S NAME HERE]** supports the EPA proposal:
  + Revise the secondary PM2.5 annual standard to a level of 12 µg/m3, because it adds no additional requirements and could streamline Implementation Plan development and compliance.

In conclusion, **[INSERT TRIBE’S NAME HERE]** supports this important step forward to protect sensitive aquatic ecosystems and cultural resources that are important to Tribes. If you have any questions or require clarification, please do not hesitate to contact **[Contact Name]** at **[Email]**.

**[INSERT NAME AND SIGNATURE OF TRIBAL LEADERSHIP HERE]**

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