**NTAA Template Letter for Tribes on the U. S. EPA’s *Review of New Source Performance Standards for Stationary Combustion Turbines and Stationary Gas Turbines* Docket No. EPA-HQ-OAR-2024-0419**

**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. For example, Tribe’s that experience elevated exposures to ozone or PM2.5 and Tribe’s concerned about protecting sacred vistas should express their importance. Be sure to replace all the highlighted text.*

*The comment deadline is* ***March 13, 2025.***  *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-2024-0419**

**Date**

Honorable Administrator

Lee M. Zeldin

U. S. Environmental Protection Agency

Docket Center, OAR

Mail Code 28221T

1200 Pennsylvania Avenue NW

Washington, DC 20460

Submitted via email to [a-and-r-docket@epa.gov](mailto:a-and-r-docket@epa.gov)

Re: **[INSERT TRIBE’S NAME HERE]** comments on **Review of New Source Performance Standards for Stationary Combustion Turbines and Stationary Gas Turbines** Docket ID **EPA-HQ-OAR-2024-0419**.

Dear Honorable Administrator,

The **[INSERT TRIBE’S NAME HERE]** is pleased to submit this letter to provide comments and recommendations on the U.S. Environmental Protection Agency’s (EPA) *Review of New Source Performance Standards for Stationary Combustion Turbines and Stationary Gas Turbines.*

The **INSERT TRIBE’S NAME HERE]** is supportive of strengthening the emissions standards for new combustion turbines. Advancements in combustion technology and post-combustion control systems have rendered EPA’s current standards for the sources (last revised in 2006) to be obsolete. More importantly the proliferation of new combustion turbines has contributed to significant increases in emissions from this growing source category of nitrogen oxides (NOx), greenhouse gases (GHGs), and other products of combustion. Further, proposals for new combustion turbines are likely to accelerate through the foreseeable future.

The harmful effects of nitrogen oxides are widespread including impacts on tribal communities, tribal lands, and critical ecosystems. Additionally, sacred vistas are impaired by plumes of nitrogen oxides and regional haze induced by this insidious pollutant. Exposures to elevated concentrations of NOx and fine particulate matter cause and exacerbate respiratory diseases among other direct and indirect health effects. This multitude of concerns is attributable, in part, to existing and proposed combustion turbines on and near tribal lands as well as those situated more remotely.

The **INSERT TRIBE’S NAME HERE]** supports strengthening the emissions standards for new combustion turbines through improved combustion performance and post-combustion application of selective catalytic reduction. The proposed regulation through multi-tiered source categories, however, does not minimize the many threats of air pollutant emissions from new combustion turbines. EPA should simplify the proposed source categorization and concurrently expand the required application of combustion controls and selective catalytic reduction (BSER) to all new combustors – unless a source applicant can demonstrate inadequate cost-effectiveness on a unit-by-unit basis.

**[INSERT TRIBE’S NAME HERE]** appreciates the opportunity to submit these comments and recommendations and looks forward to further work with EPA on this important issue. [Tribe may want to asks and recommendations for consultation on the framework if appropriate ] 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]**