Section 10 - Impact of this Strategy on Tribal Monitoring

In the 1990 Clean Air Act, Congress recognized EPA's obligation to work with the tribes in addressing air quality in Indian country, the result being that EPA's interaction with the Federally Recognized tribes was extremely limited before that time. Promulgation of the Tribal Authority Rule (TAR) in 1998 provided Tribes with the leverage to begin assessing the air quality on Tribal lands. Tribal nations generally are expanding ambient air monitoring efforts and it is generally recognized that there exists substantial needs for Tribal air monitoring support. Given the limited monitoring throughout Tribal lands, network assessments similar to the national and regional efforts discussed in Section 5 are inappropriate for the relatively new tribal prgrams because those assessments addressed aged and relatively dense monitoring networks. The prevailing air monitoring issues for Tribes include a severe shortage of resources for equipment, maintenance, operations, personnel and training.

Currently, there are 140 tribal air quality programs in various stages of development across the United States. This is a dramatic increase from only nine programs in 1995. These 140 Tribes operate approximately158 monitors in Indian Country for several types of pollutants and networks including PM (2.5 and 10), ozone, nitrogen and sulfur oxides, IMPROVE, and the NADP. These numbers will only increase as Tribes continue to build the capacity to assess air quality on their respective lands.

The National networks clearly can benefit from Tribal participation by gaining additional monitoring sites in those areas that Tribes choose to participate in the national network. Tribes share a spectrum of technical issues with States, since pollutant transport and meteorological systems ignore political boundaries. Accordingly, any measurement contribution from Tribal efforts should be viewed as an asset to a larger integrated national need for air quality measurements, and tribes should perceive some level of ownership of air quality data collected in non-Tribal lands that has relevance to Tribal air quality issues. There are many rural Tribal airsheds that could be considered pristine and therefore excellent candidates for background monitoring sites, potentially filling in important gaps in the nation's network. Tribes clearly have a part in NCore and their participation can benefit all parties as opportunities exist for Tribes to operate NCore Level 3 and Level 2 sites, particularly in rural areas where there remain significant spatial gaps in monitoring.

These comments should not be perceived as suggesting that the Tribal monitoring priority is fostering a connection to national networks. Monitoring priorities must be based on Tribal decisions, which in many cases involve developing a better characterization of local exposure to air pollutants. The linkage to national programs should be perceived as leveraging opportunities that simultaneously benefit Tribes and the national network.

Another recent development over the past 3 years has been the establishment of the Tribal Air Monitoring Support (TAMS) Center, which is a unique partnership between tribes, the Northern Arizona University Institute for Tribal Environmental Professionals (NAU ITEP) and EPA. Together, tribal environmental professionals, ITEP and EPA provide the full range of air

monitoring technical support from monitoring network design, monitor siting, quality assurance/quality control to data analysis and interpretation. The TAMS Center recognizes the sovereignty and diversity of Indian nations and is designed to build capacity and empower Tribes to successfully manage their respective programs with equanimity on a national scale.

Starting in 2001, Tribes have been active participants in the RPOs. The RPOs have provided leadership in establishing needed rural monitoring throughout the central core of the nation. As active participants in technical planning and monitoring operations, the RPO process is perhaps the first venue where Tribes have been integrated in a large scale national monitoring program. Through this interaction with RPOs as well as participation in the current NAMS, there will likely be some number of NCore Level 2 sites that are operated by Tribes.

It also is recognized that resources are limited and now is the time to encourage collaboration between Tribal, Federal, State and local entities. To avoid past mistakes, it is important to recognize the benefits of including Tribes in national monitoring strategies as they have a lot to offer in terms of filling data gaps and identifying background conditions, as well as recognizing their right to participate and the benefits that participation confers. From a health perspective, Tribes also benefit by identifying pollutants that pose the greatest risk to their health and cultural resources.