

**OITA’s RESPONSE TO COMMENTS  
FY 2025-2026 NATIONAL PROGRAM GUIDANCE**

<b>Comment</b>	<b>Location in Draft Guidance</b>	<b>Office Issuing National Program Guidance</b>	<b>Commenter</b>
<p>OITA supports Indigenous Knowledge efforts across the agency, including developing a series of trainings designed to educate and inform EPA staff on the incorporation of Indigenous Knowledge into agency efforts.</p>	<p>OITA NPG, pp. 13-14</p>	<p>Office of International and Tribal Affairs</p>	<p>National Tribal Air Association (NTAA)</p>
<p>OITA concurs with NTAA’s comment in regards to consulting on a government-to-government basis and OITA’s recently revised Guidance for Discussing Tribal Treaty Rights and Policy on Consultation and Coordination with Indian Tribes is designed lead to a renewed commitment to meaningful consultation.</p> <p>The broad scope of consultation contemplated by the revised Consultation Policy lists a number of EPA activity categories that may be appropriate for consultation. This non-exclusive list of EPA activity categories includes “Permits.”</p>	<p>OITA NPG, pp. 14-15</p>	<p>Office of International and Tribal Affairs</p>	<p>National Tribal Air Association (NTAA)</p>
<p>OITA appreciates NTAA’s support for the new Direct Implementation Tribal Cooperative Agreements (DITCAs) program of ensuring that environmental programs inside Indian Country are as robust and protective as those same programs outside of Indian Country for the benefit of tribal and non-tribal citizens living, working, and visiting Indian country.</p>	<p>OITA NPG, p. 17</p>	<p>Office of International and Tribal Affairs</p>	<p>National Tribal Air Association (NTAA)</p>