

# **AN EVALUATION OF U.S. ENVIRONMENTAL PROTECTION AGENCY'S TRIBAL AIR PROGRAM**

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## OVERVIEW OF PRESENTATION

- History and Overview of Tribal Air Program
- Evaluation Objectives and Approach
- Key Findings
- Key Recommendations
- Evaluation Lessons Learned
- More Information?



## OVERVIEW OF TRIBAL AIR PROGRAM (TAP)

- The 1990 Clean Air Act Amendments provide Tribes with the authority to implement CAA programs on their reservations
- In 1995 EPA established the TAP help Tribes address CAA requirements (576 eligible tribes)
- The goal of the program is to help increase the capacity of Tribes to manage air quality on lands within their jurisdiction
- In 2002, over 100 Tribes were receiving grants to develop air programs
- EPA provides grants used by the Tribes to:
  - hire staff
  - attend trainings
  - evaluate air quality on the reservation
  - develop regulatory programs
  - provide outreach and education



## OBJECTIVES OF THE EVALUATION

- Identify how well the Program is using its resources to:
  - Build Tribal capacity
  - Address air quality issues on Tribal lands
  - Provide the tools to reach these goals
- Develop Recommendations that EPA could consider to help further the program goals and make efficient use of grant resources



## EVALUATION APPROACH

- Evaluation Team: Office of Air & Radiation Tribal Program; Regional Tribal Program staff; Evaluation Support Division; Office of Chief Financial Officer; contractors – 1 year time frame
- Developed activities flow chart identifying main stakeholders and activities; developed list of 56 interviewees
- Reviewed available information on program activities and achievements
- Developed detailed interview guides and conducted individual or small-group interviews in-person or by phone with:
  - 24 Tribes (i.e., Tribal air managers)
  - 19 Regional staff
  - 7 HQ staff (OAR, OAQPS, AIEO)
  - 6 Non-governmental Organizations
- Developed comprehensive list of findings and over 27 recommendations for the three key objectives



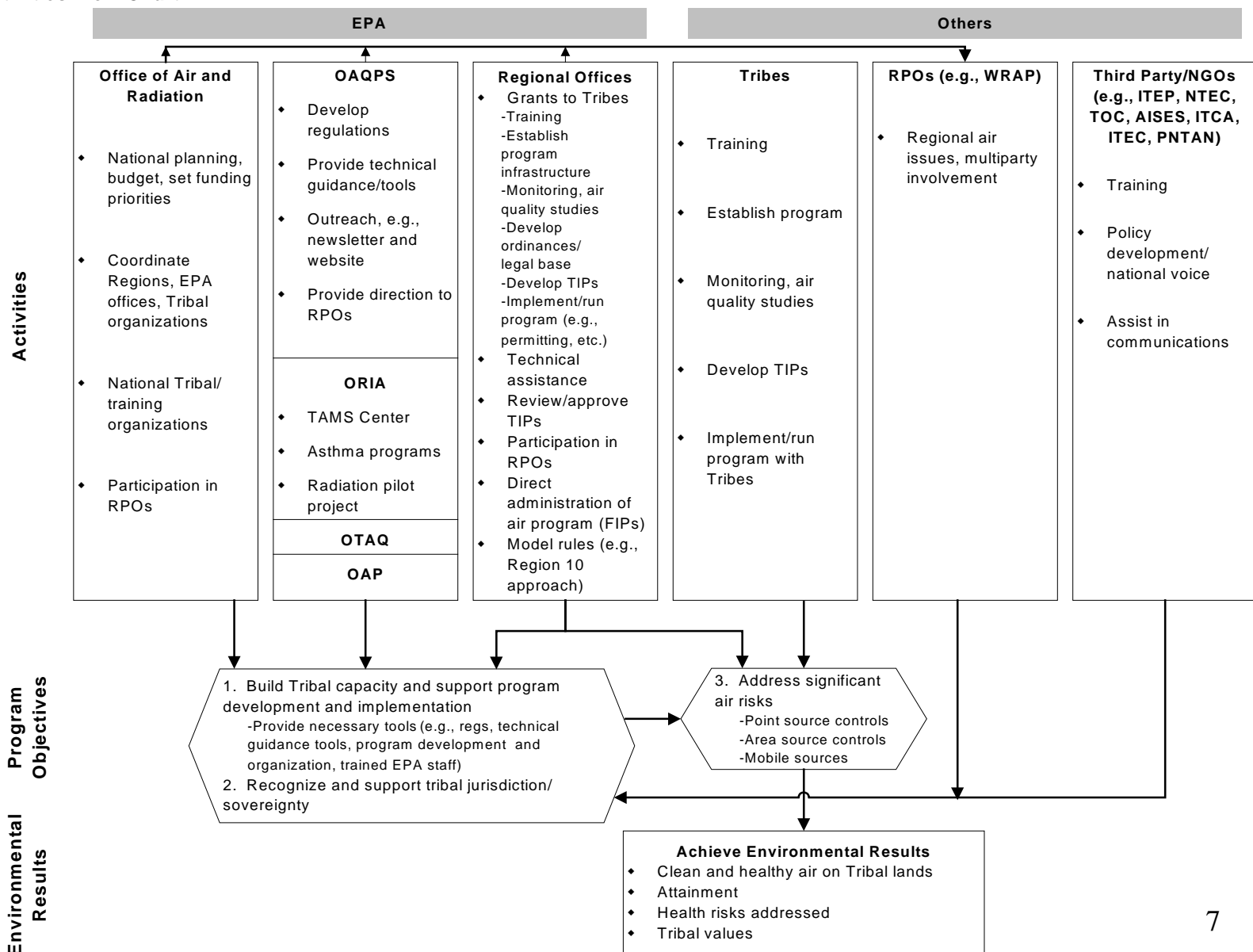
## INTERVIEW APPROACH

- Developed one-page interview guide and evaluation overview
- Version for Tribal environmental managers covered approach to evaluation, and topic areas including capacity building, relationship w/EPA, grants, technical assistance, tools, significant air issues, communication and roles, and challenges
- Interviewees were contacted through familiar channels (experienced Regional Tribal Program Coordinators; Tribal NGOs) – important step
- Critical in giving interviewees the context and purpose of the evaluation – increased comfort level, trust, and honesty



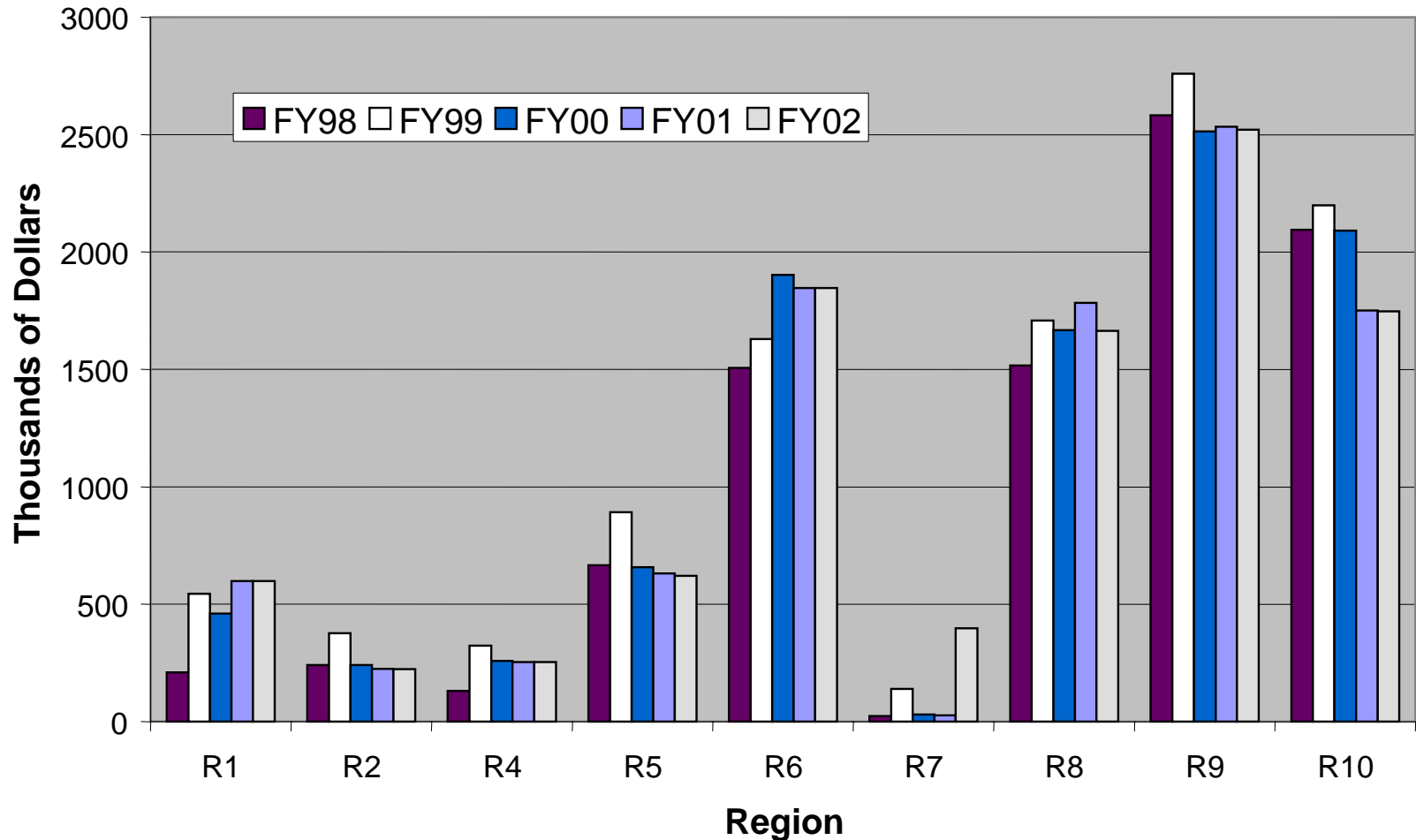
# ACTIVITY FLOW CHART

EPA Tribal Air Program  
Activities Flow Chart



# INFORMATION ON CURRENT PROGRAM

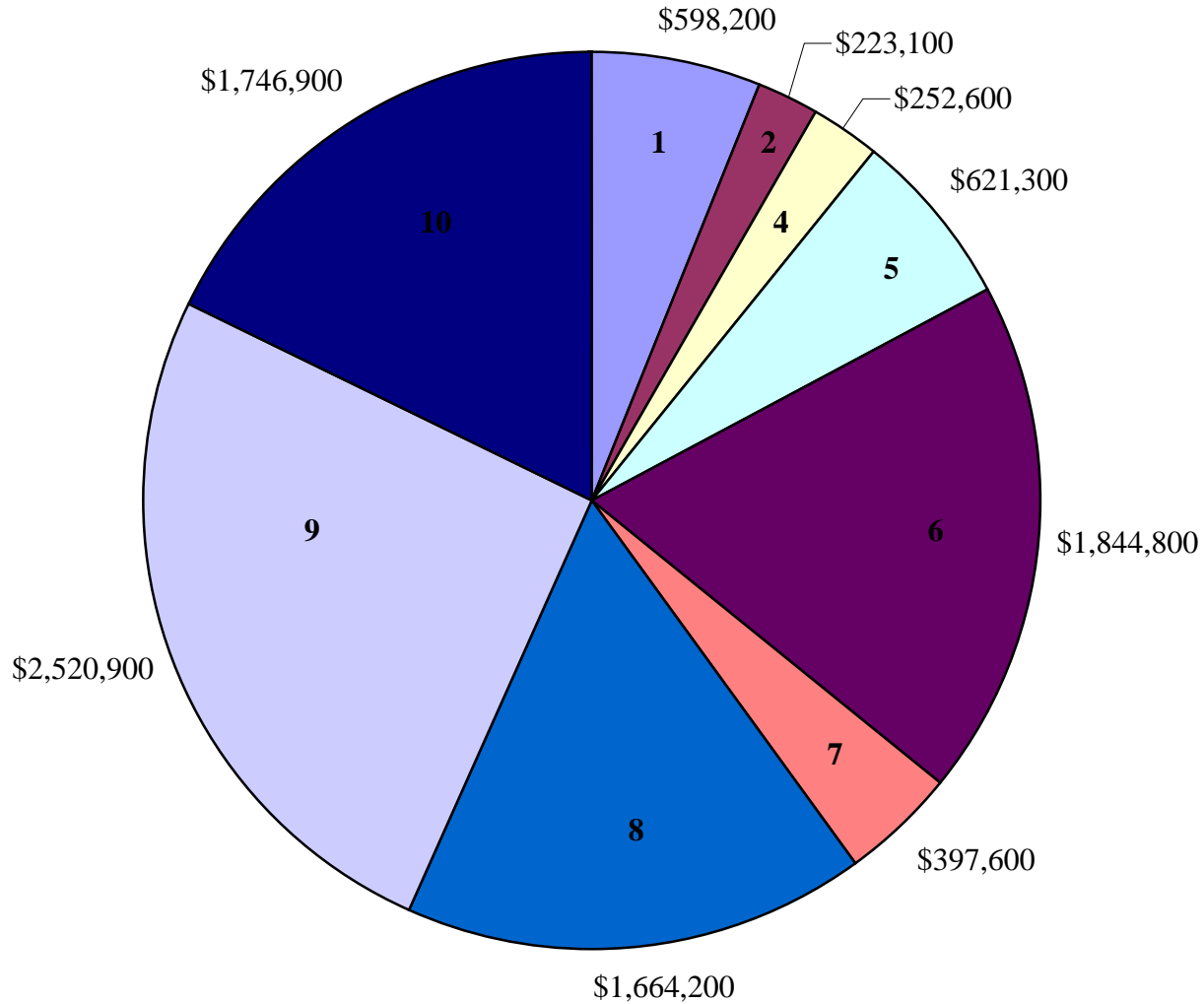
## OAR Tribal Grant Allocation By Region



Note: R3 does not have any Federally recognized Tribes

# INFORMATION ON CURRENT PROGRAM

## Tribal STAG Grant Dollars By Region (2002)



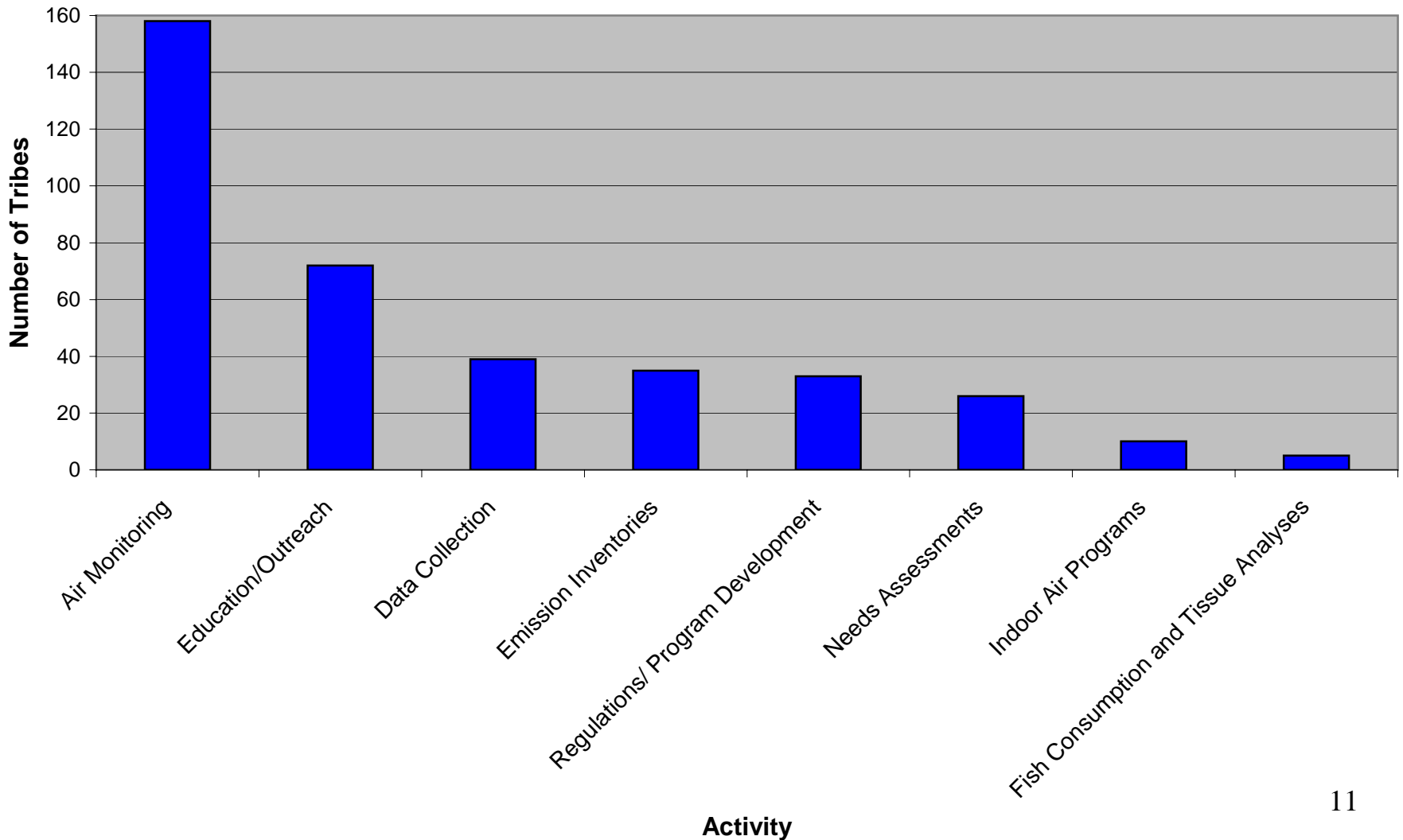


## KEY FINDINGS

- Lot of variation among and within EPA Regions regarding level of activity at Tribes
  - Developing Tribal Implementation Plans (TIPs)
  - Conducting fish consumption surveys to assess mercury deposition effects
- Tribes have made significant progress building program capacity
  - 117 Tribes with 103 or 105 grants
  - 158 air monitors
  - Number of tribes developing: emissions inventories (35), developing programs or regulations (33), outreach/education programs (33)
- Tribes benefit significantly from ITEP (Institute for Tribal Evaluation Professionals) and TAMS (EPA's Tribal Air Monitoring Support Center) training and request coverage of additional topics (e.g., grant and resource management)

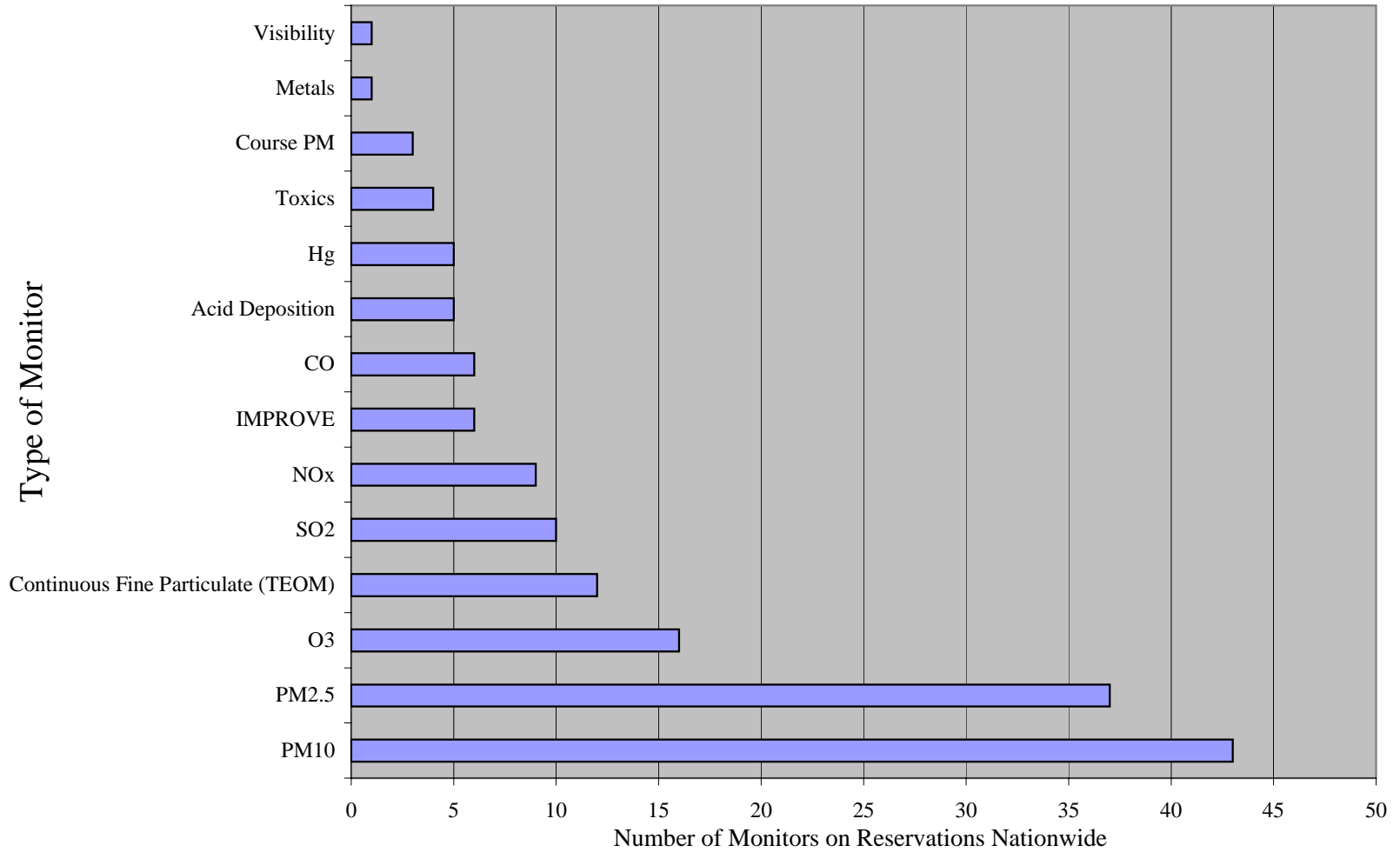
# INFORMATION ON CURRENT PROGRAM

## Air Program Activities Conducted By Tribes Nationwide (2001)



# INFORMATION ON CURRENT PROGRAM

## Tribal Air Quality Monitors



# INFORMATION ON CURRENT PROGRAM

| NUMBER AND TYPE OF AIR MONITORS ON TRIBAL LANDS BY REGION |          |          |          |           |           |          |           |           |           |            |
|---|----------|----------|----------|-----------|-----------|----------|-----------|-----------|-----------|------------|
| Type of Monitor   | Region   |          |          |           |           |          |           |           |           | Total      |
|   | 1        | 2        | 4        | 5         | 6         | 7        | 8         | 9         | 10        |            |
| IMPROVE   | 3        |          |          |           |           | 2        |           |           | 1         | 6          |
| Acid Deposition   | 2        | 1        |          | 2         |           |          |           |           |           | 5          |
| Hg  | 2        |          |          | 3         |           |          |           |           |           | 5          |
| SO2   |          | 1        |          |           | 3         |          | 5         |           | 1         | 10         |
| NOx   |          | 1        |          |           | 2         |          | 5         |           | 1         | 9          |
| PM10  |          |          |          | 2         | 4         |          | 13        | 17        | 7         | 43         |
| O3  |          |          | 1        | 2         | 3         |          | 2         | 6         | 2         | 16         |
| CO  |          |          |          | 2         | 3         |          | 1         |           |           | 6          |
| Continuous Fine Particulate (TEOM)                        |          |          |          | 1         |           |          |           | 8         | 3         | 12         |
| PM2.5   |          |          | 1        | 3         | 13        |          | 3         | 9         | 8         | 37         |
| Course PM   |          | 1        |          | 1         |           |          | 1         |           |           | 3          |
| Toxics  |          | 2        |          | 2         |           |          |           |           |           | 4          |
| Metals  |          | 1        |          |           |           |          |           |           |           | 1          |
| Visibility  |          |          |          |           |           |          | 1         |           |           | 1          |
| <b>Total</b>  | <b>7</b> | <b>7</b> | <b>2</b> | <b>18</b> | <b>28</b> | <b>2</b> | <b>31</b> | <b>40</b> | <b>23</b> | <b>158</b> |

# INFORMATION ON CURRENT PROGRAM

| SUMMARY OF ACTIVITIES CONDUCTED BY REGION 1 TRIBES WITH AIR GRANTS (1997-2002)   |                                  |   |
|--|----------------------------------|---|
| Tribe Number <sup>1</sup>  | Total Funding/<br>Years of Grant | Description of Activities   |
| 1  | \$12,000<br>1998-1999            | <ul style="list-style-type: none"> <li>• Conducted impact analysis of nearby industrial facilities.</li> <li>• Inventoried licenced air pollution sources in watershed.</li> <li>• Continued comprehensive emission inventory.</li> <li>• Attended two training courses.</li> </ul>   |
| 3  | \$145,000<br>1999-2001           | <ul style="list-style-type: none"> <li>• Assessed and prepared monitor sites.</li> <li>• Ordered monitoring equipment.</li> <li>• Distributed a fish consumption survey.</li> <li>• Initiated development of QAPP.</li> </ul>   |
| 4  | \$130,000<br>2000-2002           | <ul style="list-style-type: none"> <li>• Hired an air quality technician.</li> <li>• Trained air technician.</li> <li>• Researched regional air pollutants.</li> <li>• Hired consultant to analyze fish tissue for dioxin and mercury, assess risk to Tribal resources, and conduct a fish consumption survey to determine human risk.</li> </ul>                               |
| 6  | \$40,000<br>2001-2002            | <ul style="list-style-type: none"> <li>• Participated in Ozone Transport Commission and Regional Haze Planning Commission.</li> <li>• Developed standards and regulations for air quality, odor, and open burning</li> <li>• Hired consultant to prepare a risk assessment on mercury contamination in fish.</li> <li>• Analyzed fish tissue and consumption habits.</li> </ul> |
| <p>Note:<br/> <sup>1</sup> For reasons of confidentiality, the Tribal name has not been included. However, each Tribe is numbered to allow determination of the number of grants or activities completed by specific Tribes.</p> |                                  |   |



## KEY FINDINGS

- Tribes have made significant improvements towards assessing air quality on reservations
- Difficult to evaluate the efficiency or effectiveness of the grant programs as there are no milestones and limited information with which the Regions can track how Tribes use grant dollars
- Tribal air program staff indicate that air quality is not always perceived as a high-priority issue by governmental and business leaders in the Tribal community
  - Water quality issues tend to be a primary concern, but interest is growing in air quality issues as Tribes have increased analysis of the link between air and water pollution



## KEY FINDINGS

- Tribes express some frustration and concern about the absence of criteria through which Regions distribute grant money
  - The process and criteria for awarding air grants to Tribes varies considerably from Region to Region
- Tribes see the need for increased communication with Regional staff to help identify and address problems and to share information on a range of issues
- Limited resources restrict the ability of Regional staff to significantly increase interaction with the Tribes



## RECOMMENDATIONS

- Developed 27 Recommendations in the areas of:
  - training
  - communication
  - grants management
  - performance measures and management
  - regulatory and guidance development
  - technical assistance
  - program implementation
- Vast majority of recommendations have been or are being implemented/developed; with the exception of those requiring additional resources



## KEY RECOMMENDATIONS

- Recognized the limitations, in terms of staff and resources, facing the OAR TAP and its ability to effect these recommendations - also recognized that some are already underway
- Work with the Tribes to identify clear performance measures with which to evaluate program effectiveness
  - *Developing measures to ensure that priorities are addresses*
- Develop clear criteria Regions can use to distribute grant dollars (allow for Regional flexibility)
  - *Draft final consistency policy developed by Tribal Air Coordinators and Air Program Managers*



## KEY RECOMMENDATIONS

- Directly involve Tribes in decision-making, rulemaking efforts, and guidance documents that affect their programs
  - *OAR is funding National Tribal Environmental Council to host and develop a National Tribal Air Association*
- Augment existing efforts to provide training and outreach to the Tribes and work to help define roles and responsibilities at National, Regional, and Tribal level
  - *OAR is working on various training mechanisms and consolidating information sources to facilitate access*
- OAR and Regional coordinators could work with Tribal air managers to convene environmental management workshops for Tribal leaders to increase the level of interest in air quality issues on Tribal lands
  - *Multi-media conferences are being supported and a training video on CAA for Tribal leaders is under development*



## **EVALUATION LESSONS LEARNED: WHAT WORKED AND WHAT COULD BE IMPROVED**

- It is important not to rush the set up/scoping portion of the evaluation. Spending time to define specific project deliverables, roles, and responsibilities is essential.
- Cultural sensitivity was of particular importance to this project. It is critical to ensure that staff are sensitive to cultural issues. Having a contractor more familiar with Tribes and Tribal issues would have been beneficial to the evaluation.
- The involvement of a diverse range of stakeholders added value to the final product, as did the consistent participation of staff from two Regional Tribal programs.



## **EVALUATION LESSONS LEARNED: PROCESS BENEFITS**

- The evaluation helped identify the focus and organization of the program
- The evaluation and strong Tribal participation helped to improve communication with the Tribes and collect needed data
- The evaluation was instrumental in helping to emphasize the need for Regional Tribal programs to work and operate collaboratively as a National Tribal Air Program, rather than independently



## MORE INFORMATION?

- To view a fact sheet of the Evaluation, go to:  
<http://www.epa.gov/evaluate/factsheets/factsheet2.pdf>
- To view the full Evaluation Report go to:  
[http://www.epa.gov/air/tribal/attachmts/final\\_oar\\_pe.pdf](http://www.epa.gov/air/tribal/attachmts/final_oar_pe.pdf)
- For more information on this presentation contact Brian Swett, U.S. Environmental Protection Agency, 202-566-2202 ;  
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- U.S. EPA's Evaluation Support Division:  
<http://www.epa.gov/evaluate>