



National Tribal Caucus

Budget and Priorities Recommendations

Fiscal Year 2027

Acknowledgements

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FY 2027 Budget Request and Priority Recommendations

Executive Summary

The National Tribal Caucus (NTC) serves as a high-level advisory body to the U.S. Environmental Protection Agency (EPA), identifying and addressing environmental issues that affect tribal nations and Alaska Native villages. In FY 2027, the NTC requests a tribal set-aside of \$542.54 million to support environmental programs across Indian Country. This funding is essential to achieving parity with state allocations and ensuring tribal governments have the resources to protect human health, preserve ecosystems, and uphold tribal sovereignty.

The NTC's recommendations align with EPA's Powering the Great American Comeback Initiative, which seeks to revitalize the nation through five strategic pillars: clean air, land, and water; energy dominance; permitting reform; leadership in artificial intelligence; and revitalizing auto jobs. Tribal nations are uniquely positioned to contribute to these goals through sovereign governance, environmental stewardship, and data innovation. From clean water infrastructure to toxics monitoring and permitting reform, tribal programs are foundational to the success of this national comeback.

Since EPA adopted the 1984 Indian Policy, its commitment to tribal consultation and partnership has evolved—but remains incomplete. The NTC urges EPA to act with urgency to institutionalize tribal priorities across all media areas, and to ensure that tribal governments are recognized as co-equal authorities in environmental decision-making. The recommendations outlined in this document reflect both the enduring trust responsibility and the opportunity to build a future rooted in justice, resilience, and shared prosperity.

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Summary of Recommendations

Land and Emergency Management

FY 2027 budget request: \$31.5 million

- Protect human health and the environment while recognizing the cultural values and unique needs of American Indian tribes, tribal nations, and Alaska Native villages.
- Improve communication and foster interagency collaboration between tribes, tribal nations, Alaska Native villages, federal agencies, and other partners.
- Increase tribal opportunities to guide Office of Land and Emergency Management (OLEM) with developing policies and programs related to the evolving needs and priorities of Native environmental programs.

Protections for Water and Tribal Beneficial Uses

FY 2027 budget request: \$236 million

- Drinking water and Clean Water Indian Set-Aside, and Alaska Native village programs.
- Drinking Water Infrastructure Needs Survey and Assessment (DWINSA)—The Drinking Water Infrastructure Grants-Tribal Set-Aside Program (DWIG-TSA) is based on allocations from EPA’s DWINSA. Conducted every four years, the survey gives Congress an assessment of our nation’s drinking water infrastructure needs, including those on tribal lands, for 2021–2040.
- Alaska Native Villages and Rural Communities Water Grant Program—The NTC requests that funding levels return to \$50 million and that the annual allocation be distributed to Indian Health Service instead of an Alaska State agency.
- CWA § 104(b)(3) Tribal Wetland Grants—The NTC requests that Office of Water increase its internal tribal set-aside for tribal wetland grants from 10% to 20% of the annual appropriation to support the development of Tribal Wetland Protection plans.

Advance Tribal Science Priorities

FY 2027 budget request: \$542.54 million

(This amount is the same as the total tribal set-aside amount requested for all FY 2027 priorities, since tribal science priorities are intimately intertwined with every priority area and recommendation.)

- Work with urgency to address the environmental impacts of development and energy production.
- Enhance tribal environmental funding to achieve parity with state allocations, ensuring tribes can effectively address pressing environmental challenges.

- Strengthen tribal partnerships with the new Office of Applied Science and Environmental Solutions to meet tribal research and data needs to protect tribal health and the environment.
- Support the Tribal Science Council.

Air Quality

FY 2027 budget request: \$94 million

- Increase funding in support of new and existing tribal air programs and create sustainable air quality programs.
- Provide technical support on impacts to cultural lifeways and other important issues.
- Adhere to “Tribal Sovereignty” and “Consultation” definitions.
- Provide greater support for Alaska tribes in the development of tribal Clean Air Act programs.
- Support for tribes with developing tribal implementation plans and permit programs.
- Air quality assessment via tribal monitoring, emissions inventory and data collection and management.

Parity in Tribal Data Management

FY 2027 budget request: \$50 million

- Increase funding through the EPA Office of the Chief Financial Officer Cooperative Agreement to support the Tribal E-Enterprise Leadership Council (EELC) with their mission for collaborative leadership among states, tribes, and the EPA.
- Fund efforts to support EPA employees to roll out tribal EELC pilot projects to the national level. Example: Roll out the Tribal Assessment, Total Maximum Daily Load Tracking and Implementation System (ATTAINS) pilot to support ATTAINS participation for all tribes in the nation.
- Advocate for tribal parity in EPA funding and support. Example: Advocate for operations and maintenance costs to be covered under EPA grant programs, including the Exchange Network Grant Program.
- Continue to serve as a community of practice for tribal environmental professionals in the areas of environmental data management and sharing.
- Continue to serve and grow as a resource for training and technical assistance in tribal environmental data and information management through the National Environmental Information Exchange Network Cooperative Agreement.
- Recommend that the future governing structure of the Exchange Network serves tribes and tribal technology and data management needs while recognizing and supporting tribal data sovereignty through policy and practice.
- Advocate for tribal parity in funding and support for the creation of nationwide tribal environmental organizations, such as states have in the Environmental Council of the States.

- Invest in training and mentorship programs focused on Artificial Intelligence (AI) literacy, environmental data analytics, and ethical use of emerging technologies.

Ensure Safety of Chemicals for People and the Environment

FY 2027 budget request: \$25.54 million

Toxics

FY 2027 budget request: \$16.5 million

- Toxic Substances Control Act (TSCA) and Office of Pollution Prevention and Toxics budget recommendation: Research and policy development and enhanced outreach.
- Set aside funding for tribes to engage in monitoring of exposure pathways through fish and plants in locations of tribal significance to inform TSCA risk evaluations, including new chemicals.
- Provide funding for tribes to educate tribal citizens and community members on the dangers that toxics pose to communities throughout Indian Country, using updated materials and working with the Toxics Release Inventory program.
- Reinforce financial sustainability of underserved communities by removing match requirements and establish tribal supplemental set-aside funding in the Pollution Prevention, Source Reduction Assistance, and Safer Choice grant programs.

Pesticides

FY 2027 budget request: \$9.04 million

- Address issues in pollinator decline. The NTC asks that EPA continue to fund and provide technical assistance to tribes in developing and implementing pollinator protection plans in accordance with EPA guidance.
- Increase tribal pesticide funding. Achieve funding parity between tribes and states for pesticide-related activities.
- Enforcement and compliance. Expand programs in areas where there is limited or no existing coverage of Indian Country and increase funds to retain and maintain existing tribal programs.

Enforcement of and Compliance with Tribal Environmental Laws

FY 2027 budget request: \$105.5 million

- Develop and implement an agency-wide policy to include all unique tribal risks prior to conducting program risk assessments.
- Assist tribes with pilot funding and technical support for ordinance enforcement.
- Provide funding to each region based on the regional number of federally credentialed tribal inspectors to support tribal and EPA compliance assurance and monitoring activities.

- Increase General Assistance Program funding to \$183,750 per tribe and implement the increased spending flexibility intended by Congress and the Indian Environmental General Assistance Program Act of 1992.

Strengthening Our Partnerships to Advance Cooperative Federalism

FY 2027 budget request: \$542.54 million

(This amount is the same as the total tribal set-aside amount requested for all FY 2027 priorities, since strengthening our partnerships underscores every priority area and recommendation.)

- Provide American Indian Environmental Office (AIEO)-facilitated funding from EPA program offices to support the NTC with the mission of the National Tribal Operations Committee (NTOC) to serve as a forum for federally recognized tribes to work with EPA senior leadership on policy and resource matters related to tribal capacity building and environmental program development and implementation in Indian Country, and to identify mechanisms for tribes and EPA to facilitate actions that protect human health and the environment.
- Work with urgency to address environmental impacts from development and energy production.
- Fully fund tribal environmental programs to address decades of chronic underfunding.
- Remain engaged with tribes on a government-to-government basis. Continue to recognize tribal sovereignty and acknowledge each unique tribal government(s) as the appropriate primary authority over reservation lands, habitats, and ecosystems.

Introduction

The National Tribal Caucus (NTC) is entrusted with identifying and elevating regional and national environmental priorities that affect tribal nations and Alaska Native villages. As sovereign governments, tribes hold inherent authority to protect their lands, waters, and communities—and EPA has a trust responsibility to support that work through meaningful partnership, full funding, and sustained consultation.

Since the adoption of the EPA Indian Policy in 1984, tribes have worked alongside EPA to advance environmental protection in Indian Country. While progress has been made, the goals of that policy remain unrealized. Tribal environmental programs continue to face chronic underfunding, regulatory barriers, and inconsistent engagement. The NTC calls on EPA to act with urgency to institutionalize tribal priorities across all media areas and to fully recognize tribal governments as co-equal authorities in environmental decision-making.

This FY 2027 Budget and Priorities document reflects the NTC’s commitment to cooperative federalism and environmental parity. It also aligns with EPA’s Powering the Great American Comeback initiative, which outlines five strategic pillars—Clean Air, Land, and Water; Energy Dominance; Permitting Reform; AI Leadership; and Revitalizing Auto Jobs. Tribal nations are essential partners in each of these areas, offering deep expertise, cultural stewardship, and innovative approaches to environmental governance.

The NTC welcomes continued collaboration with EPA Administrator Lee Zeldin and agency leadership to ensure that tribal voices shape the policies and programs that affect our lands and lifeways. Through this document, we offer a clear roadmap for advancing tribal environmental priorities, strengthening intergovernmental partnerships, and fulfilling the federal government’s trust and treaty obligations.

The following budget priority media areas are not ranked by importance; rather, they are of equal priority within Indian Country.

Expanded Budget Recommendations

The NTC recommendations for EPA for FY 2027 are fully described in the following sections.

Land and Emergency Management

FY 2027 budget request: \$31.5 million

The NTC worked with the Tribal Waste and Response Steering Committee (TWAR SC) on providing an amount to meet the overarching goals. The TWAR SC is a tribal partnership composed of tribal professionals working in waste, emergency response, Superfund, brownfields, federal facilities, and underground storage tanks (USTs). It was established in 2009 as part of a cooperative agreement with

EPA's Office of Land and Emergency Management (OLEM) and the Institute for Tribal Environmental Professionals (ITEP). The TWAR SC meets at least six times a year to provide input to EPA and other federal agencies, while cooperating with ITEP and other tribal partnerships. They strive to provide two-way communication between tribal professionals and staff at the EPA. Using this priority document is one tool that ensures tribal concerns and suggestions are considered by OLEM personnel and others at EPA.

Priority: Cross-programmatic

- Increase awareness throughout EPA on the definition of businesses in rural tribal communities.
- Work with other offices, agencies, and outside partners to avoid scheduling conferences on similar media during, or adjacent to the Tribal Lands and Environment Forum.
- Identify and assist Alaska Native villages and tribal nations pursuing community-led relocation to evolve their capacity to implement waste and response programs and infrastructure, and to address existing contaminated lands and legacy waste that is affecting Native lands and waters.
- Work with tribes and Alaska Native villages on integrating traditional and Indigenous knowledge, considering tribal beneficial use, addressing tribal needs, and ensuring tribal data is used and tribal perspectives are included in decisions and actions taken by OLEM offices.
- Include tribal goals and targets in Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) cleanup projects.
- Hold meetings with tribal and Native professionals to discuss current issues involving tribal data sovereignty and usability of EPA databases focused on OLEM programs.
- Provide support for EPA project officers, technical staff, and grants specialists to travel to tribal lands and Alaska Native villages.
- Continue to support the development and growth of the Tribal Lands Assistance Center website across all media.
- Consider heat stress, wildfire risk, flooding, and other natural disasters in all OLEM program decision making.
- Increase awareness throughout EPA of the definition of businesses in rural tribal communities, to include not-for-profit businesses as well as nonprofits that serve the communities (e.g., schools, clinics, public utilities).
- Reduce grant reporting burdens by changing the current quarterly requirement to biannual reporting.

Priority: Emerging Issues

- Collaborate with the Tribal PFAS Working Group to develop and provide tribes with training on proper sampling procedures, results interpretation, cross-contamination mitigation, and tribal exposure pathways.
- Incorporate community involvement and shared research objectives for tribal exposure pathway research, including whole-food webs and culturally sensitive plants that protect and respect tribal data sovereignty.
- Assist tribes in holding manufacturers of contaminants responsible for cleanup activities yesterday, today, and into the future, on ancestral and Aboriginal territories, ceded and

unceded, tribal lands and Alaska Native villages; and lands adjacent to tribal lands and Alaska Native villages that are harming, or have the potential to harm, tribal or Native peoples.

- Continue to provide robust public outreach and support research for 6PPD-quinone and decabromodiphenyl ether (“decaBDE”).
- Continue to engage tribes and Alaska Native villages through consultation during changes to PFAS rules and policies.
- Work in partnership with tribal nations and Alaska Native villages to create reuse assessments for lands being lost due to community-led relocation, as well as the lands being moved to, which may have been previously injured.

Priority: Solid Waste

- Invest in tribal solid waste capacity development and improve backhaul programs in Alaska Native villages through continued investment and improvement, to include recycling and waste diversion initiatives.
- Identify emerging contaminants, their impact on tribal lifeways, and associated waste management considerations that complicate continued progress.
- Identify and create an outreach plan with tribal colleagues to facilitate the identification of emerging contaminants that affect tribal lifeways and food webs.
- Design a roadmap for tribes to create purchasing policies that support the reduction of excessive packaging and extended producer responsibility.
- Continue to work with other federal agencies to create a crosswalk of available solid waste funding sources, eligibility criteria, and funding restrictions.

Priority: Brownfields

- Tribal environmental response programs developed under the 128(a) program and environmental cleanups completed under Section 104(k) allocations, are an exercise in environmental self-determination for the recipients of these grants. This expression of self-determination is unique and specific to each recipient. As tribal nations reacquire their lands or lose commercial leases, they inherit legacy sites that may be contaminated. These sites, especially in the case of fueling stations, are a part of essential infrastructure that is not currently eligible for brownfield funding. This must be addressed by ensuring that legacy sites, even if operational and vital to a community, are eligible for brownfield funding.
- Require EPA staff and contractors, overseeing targeted brownfield assessments or supporting tribal brownfield programs, to make sure mechanisms and resources provide meaningful opportunities for public participation and include tribal councils or governing bodies and other tribal departments, to help align the direction and technical assistance with tribal priorities and redevelopment needs.
- Create a roadmap to develop multiyear workplans that focus on national consistency for reporting requirements across all regions.
- Use EPA’s authority under CERCLA to enhance tribal environmental self-determination by assisting tribes in establishing MOAs.

Priority: Underground Storage Tanks

- Develop easy-to-understand tools that focus on emerging fuels, and UST closure and removal plans by working with industry and tribal UST professionals.
- Provide biannual reports to the TWAR SC about discussions and networking conducted at tribal business conferences by OUST staff during the timeframe of this priority document.
- Provide outreach materials and training to the service industry highlighting the difference between state and tribal regulations for UST operations.
- Form a national workgroup to craft mechanisms facilitating memoranda of understandings with states so tribes may participate in state-funded programs that meet financial responsibility requirements without becoming subject to state regulatory authorities.

Priority: Superfund and Federal Facilities

- Continue to provide updates on EPA's work with other federal agencies on crucial minerals and recovery pilot sites, and how they are involving tribal nations and Alaska Native villages.
- Optimization studies at contaminated sites involving tribal nations or Alaska Native villages should make sure tribal data is used and tribal perspectives are included.
- Ensure tribal research permits are obtained (when required) well in advance when data is being collected in Indian Country.
- Provide tribal training opportunities, and pilot site-specific projects, to explore new technologies, tools, and research and their impacts on contaminated sites. Examples include the use of artificial intelligence and unmanned apparatus.
- Ensure tribal and ecological resiliency when designing and implementing remedies. EPA should consider providing presentations on the work that the Office of Superfund Remediation and Technology Innovation (OSRTI) is doing with Native nations and communities.
- Fund and implement the revised Residential Lead Policy and provide support to tribes to implement the Tribal Lead Curriculum in Indian Country and Alaska.
- Continue to support tribes leading the effort in cultural resource assessment, data collection, and monitoring on all sites in Indian Country and Alaska Native villages with OLEM.
- Continue to support EPA's engagement with both the Office of Water and OSRTI with tribes at the national and regional levels during the development of remedial investigation/feasibility studies, remedial design, and implementation phases.
- Recognize that tribal standards, and tools used by tribal Superfund programs, are crucial to protecting downstream waters, lands, and traditional lifeways. These may include measures protecting cultural resources and tribal data integrity, treatment as a sovereign, tribal water quality standards, and the investigation and use of innovative technologies. Working in partnership with tribes, EPA should respect these standards and tools, and make sure tribal data are secure and considered in decision making.
- Continue investing in and supporting the Tribal Superfund Working Group through meetings, site visits, mentoring opportunities, and capacity-building projects.
- Coordinate closely with tribes when EPA Office of Research and Development approaches regional EPA offices to facilitate research at tribal Superfund sites, respecting tribal management oversight, deadlines, and needs.

- Increase funding to support tribes in the development of their own tribal Superfund cleanup programs as well as their capacity to oversee, coordinate, and administer tribal remedial response cooperative agreements, including local tribal cultural resource monitoring with EPA on national priority-list sites. Ensure commensurate funding for support of agency cooperative agreements and increase awareness of their availability.
- Maintain annual reporting from the Office of Mountains, Deserts and Plains on its operation, including coordination with tribes, tribal partnership groups (TPGs), Regional Tribal Operations Committees, and other tribal organizations.
- Make sure that tribal consultation is conducted when future mining on public lands is proposed.
- Prioritize tribal site use during Superfund revitalization and reuse planning, including remediation goals that are protective for tribal use.
- Continue to train new EPA remedial project managers on collaborating with tribes on Superfund sites.

Priority: Emergency Management

- Continue providing Spill Prevention Control and Countermeasure and other trainings specifically targeted to tribal professionals.
- The increase in electric vehicles and renewable energy systems means we will all be dealing with an increase in the production and demand of batteries, diverse distributed energy systems, and potentially dangerous materials. We ask OEM to develop trainings in the next two years to help tribal professionals better prepare for emergencies and recovery.
- Over the course of the next year, begin to incorporate hydrogen and other alternative fuels concerns in planning for emergency response activities and resources.
- When considering future rulemaking, potential increases in hydrogen and other alternative fuels must be addressed. The acquisition, production, storage, and or transport of these materials will affect Native lands and communities, and resources are needed for tribes to develop their own capacity to address potential emergencies.
- Expand training opportunities for tribal professionals with more table-top exercise trainings, where tribal staff can work through real-world scenarios to better prepare for protecting their own nations and communities.
- Prioritize inspecting Spill Prevention, Control, and Countermeasure facilities in Indian Country and Alaska.
- Continue to support and encourage tribal environmental emergency response programs to be involved with their regional and local response agencies through local emergency planning committees and or in forming their own tribal emergency response committees (TERCs).
- Expand webinars for tribal professionals focused on how to establish and build effective TERCs.

Protections for Water and Tribal Beneficial Uses (TBUs)

FY 2027 budget request: \$236 million

\$25 million for tribal Multimedia Implementation Grant Funds

\$55 million for the tribal portion of CWA Section 106 funding

\$30 million for the national tribal CWA Section 319 program
\$36 million for the tribal portion of CWA Section 104(b)(3) funding
\$90 million or 5% SRF set-aside

Improve Access to Safe Drinking Water and Basic Sanitation for Tribes and Alaska Native Villages

- Solidifying a congressional increase in the percentage allocated to the Drinking Water State Revolving Fund from 2% to 5% for set-aside tribal DW grants.
 - FY 2023 DW tribal set-aside identified \$10.3 million for tribal DW grants, far below the 2% threshold.
 - FY 2023 CW tribal set-aside identified \$15.5 million for tribal wastewater grants, reflecting half of the amount allocated in FY 2021 (\$33 million = 2% of CWSRF).
 - Reduced funding in set-asides due to congressional earmarks.
 - Request future DW and CW tribal set-asides to be held harmless from congressional earmarks.

FY 2023 Drinking Water Infrastructure Needs Survey and Assessment

- The DWIG-TSA is based on allocations from EPA's Drinking Water Infrastructure Needs Survey and Assessment (DWINSA), conducted every four years to provide Congress with an assessment of our nation's DW infrastructure need, including tribal lands for the years 2021–2040.
 - 2023 DWINSA identified a \$4.1 billion infrastructure need for tribal DW systems, which breaks out to \$3.2 billion for American Indian systems and \$0.9 billion for Alaska Native systems.
 - 835 public water systems that are tribally owned and serve an estimated 1.4 million people.
 - Approximately half of these systems exceed EPA health base standards.

Alaska Native Villages and Rural Communities Water Grant Program

- FY 2027 NTC requests that funding levels return to \$50 million and that the annual allocation **be distributed by Indian Health Service** instead of an Alaska State agency.
- FY 2023 funding level is approximately \$36 million. This program is administered with Region 10 and in close cooperation with the State of Alaska to address Alaska Native villages' (ANVs) sanitation needs.
- ANVs request to bypass the State of Alaska, and instead have Region 10 work directly with ANVs in distribution of funds.

Safe Drinking Water Act (SDWA)

In FY 2023, Congress appropriated \$7.8 million for tribal grants to address PFAS and other contaminants of emerging concern. These funds are allocated to the regional offices and available to eligible tribes that conduct Public Water System Supervision work, such as enforcement of PFAS drinking water

standards. We recommend continued funding and prioritization as long as PFAS and other emerging contaminants pose hazards to the environment.

CWA §106 Tribal Grants

The NTC requests \$55 million for FY 2027 tribal CWA 106 funding, which reflects approximately 22% of the base allocation (\$237 million) to address new threats to tribal waters (cyanotoxin, microplastic, and tire compounds runoff) and protection requirements on tribal lands.

Multipurpose Funds and DITCAs

Congress established the Multipurpose Grant (MPG) program for states and tribes in the Consolidation Appropriations Act of 2016. This allows Congress to appropriate MPG funds for use at the discretion of states and tribes to support high-priority activities that supplement those funded by existing environmental laws. MPG funds were appropriated for 2016, 2018, 2019, 2020, and 2021. Tribes with delegated federal regulatory authority received \$1.5 million through the Treatment in the Same Manner as a State (TAS) process in 2021. Future MPG requests will be made through the House Appropriations Committee.

CWA § 104(b)(3) Tribal Wetland Grants

FY 2023 appropriation identified \$36 million for identification, assessment, and protection of state and tribal wetlands.

- Even though there are no congressional tribal set-aside funds, EPA provides an internal tribal set-aside for tribal wetland grants which is approximately \$3.6 million or 10% of the appropriation. EPA awards between \$50,000 to \$350,000 per grant, typically for identification, assessment, and protection of tribal wetlands.
- NTC requests that OW increase its internal tribal set-aside for tribal wetland grants from 10% to 20% of the annual appropriation to support the development of Tribal Wetland Protection plans.

Advance Environmental Research and Tribal Science Priorities

FY 2027 budget request: \$542.54 million

There are 574 federally recognized tribes in the United States, with a collective population of more than one million people who are both tribal citizens and U.S. citizens. Indian Country is nearly 70 million acres, which equals 4% of the total U.S. land base. EPA must achieve a new era of partnership with tribes, and several considerations related to tribal funding must be addressed. Tribes face many disparities, such as lack of access to clean drinking water and healthy ambient air quality. Together we must partner to address knowledge gaps in protecting human health and the environment.

Another important partnership consideration is tribal sovereignty. The NTC asks that EPA continue to recognize each unique and separate tribal government as the appropriate and primary authority over all

reservation lands, habitats, and ecosystems. Finally, the NTC recommends that EPA enable effective tribal data management and promote data sovereignty by continuing to support the EELC and the Tribal Exchange Network Group (TXG).

Funding

Ensure parity in tribal funding. Indian Country makes up 4% of the U.S. land base, yet it does not receive adequate funding for its size. To achieve true funding parity and sustain crucial programs, tribes must receive both an increased percentage of the overall funding amounts and a higher dollar amount. The NTC appreciates that EPA aspires to recognize the crucial needs of its partners in delivering environmental protection to all U.S. citizens. By fully funding tribal nations and Alaska Native villages, EPA can empower tribal communities in a number of important ways and address our needs, such as providing employment and improving the quality of the environments where tribal people live and work, and sustaining traditional lifeways.

Ensure tribal authority to implement environmental regulations. Along with providing funding parity, it is vital for EPA to ensure that tribes have the authority to design, implement, and enforce environmental regulatory programs. Under existing environmental policies, tribal regulatory authority is sometimes defined as TAS status. Achieving this status requires a lengthy application and approval process and is further complicated by additional legal burdens for tribes in certain states. Because of these circumstances, it is imperative that funding and other assistance available to tribes not be limited only to tribes that meet federal TAS requirements.

Continue government-to-government engagement between EPA and tribes. An era of partnership between tribes and EPA must be grounded in the government-to-government relationship that exists between the federal government and Indian nations, including meaningful tribal consultation that precedes the implementation of all policies that have implications for tribes and tribal lands. Funding decisions that support this partnership must take place against the backdrop of tribal consultation. Tribal consultation on GAP guidance is an example of funding-related consultation that would support this goal.

Tribal Sovereignty

Continue recognizing tribal governments as appropriate primary authorities. The NTC asks that EPA continue to recognize unique tribal governments as the appropriate primary authorities to manage and regulate reservation lands, habitats, and ecosystems—thus upholding the 1984 Indian Policy.

Air Quality

FY 2027 budget request: \$94 million

For the FY 2027 Budget recommendation, the NTC is recommending \$5 million for tribal air and climate change programs. Because there has been significant air quality program expansion and because more tribes are seeking new air-program funding, the growth in programs is greatly outstripping the available resources. An increase in funding will meet the previously identified need and address the inflation costs that have impacted tribal air programs. It will also demonstrate the Administration's commitment to respect sovereignty and self-governance of American Indian tribes and Alaska Native villages and will meet commitments to ensure that federal funding and support programs effectively address needs. A funding increase will help more tribes build their Clean Air Act Programs at this crucial moment in history and bears witness to the impacts of the economic challenges and health concerns that disproportionately harm Native Americans.

Ambient Air Quality

Criteria pollutants: Tribal air quality programs monitor a variety of criteria pollutants due to concerns about health protection, environmental preservation, regulatory compliance, sovereignty, and policy development. Monitoring criteria pollutants assists in reducing risks for individual tribal communities by providing site-specific data. This allows tribes to participate in the designation process. In addition, supporting tribes in managing mobile source emissions to address ambient air quality and climate adaptation is important to help address the health and environmental impacts for American Indian and Alaska Native communities. For example, road dust impacts Alaskan Native villages, as well as many rural tribal communities. Regional haze continues to be a concern for cultural and spiritual practices, economic development, environmental damage, and health impacts. Providing funding and technical support is important in these communities.

Permitting: Permitting for American Indian and Alaska Native communities is conducted in most cases by EPA. It is important that EPA conduct consultation with tribes throughout the development and issuance of any air permits. EPA should be proactive in regional consultations. Tribes have expressed interest in permit review as well as permit program development, while others have begun implementing their own permitting programs.

In addition, there is a growing need for increased regulation (permitting and or enforcement) of metallic mining operations to improve air quality in American Indian and Alaska Native communities. Specifically, there are concerns about fugitive dust and air toxics emissions from taconite mining in Region 5; uranium mining and rare earth mining and milling in Regions 6, 8, and 9; and heavy metal and gold mining in Alaska.

Support for tribes in developing TIPs and permit programs: Tribal Implementation Plans (TIPs) are crucial for self-governance and environmental management. Some plans are comprehensive, covering all the sources within the reservation. A few are more targeted, while others are new source review or minor source permitting programs. For tribal program flexibility, the Clean Air Act and the Tribal Authority Rule allow a modular approach.

Air quality assessment via tribal monitoring, emissions inventory, and data collection and management: Understanding air quality on each reservation is the starting point for all tribal air quality program development. It is also the basis for asserting tribal sovereignty by providing for an understanding of the health, environmental, and cultural impacts for the tribes so that the citizens of each reservation can be empowered to support ongoing program activities. As a result, emissions inventory development and air quality monitoring are critical to taking these first steps in understanding air quality for all American Indian and Alaska Native communities.

Tribes face some common barriers and issues when conducting these assessments. For example, because of existing state monitoring networks, many of the EPA Regional Offices do not recognize the need for tribal air monitoring. However, tribes have found that by conducting their own regulatory monitoring, they are more empowered to participate in the designations process for new National Ambient Air Quality Standards. The expense of ongoing monitoring has also constrained the expansion of monitoring networks. Tribes conducting regulatory monitoring have had limited access to the Technical Systems Audits required for certification of the data. While others have equipment that is old and outdated and in need of replacing, others have struggled with Quality Assurance Project Plan (QAPP) approval and inconsistency between and within the Regions. With the implementation of sensor technology, tribes have new opportunities to undertake air quality assessment.

Air toxics: Tribes continue to maintain air toxics as a priority concern; there is an ongoing interest in the impacts of mercury on tribal resources, such as exposure from fish consumption as well as exposure from deposition on cultural medicinal resources.

Other tribes have concerns about exposure from specific sources and source categories including, but not limited to, emissions from oil and gas pipelines and power plants, and taconite and uranium mining operations.

Emerging pollutants – PFAS/PFOS and 6PPD/6PPD-Q: The NTC is concerned that the EPA PFAS Strategy does little to expand the understanding of the impact of PFAS/PFOS through the air media. Given that PFAS are “forever chemicals and bioaccumulating,” the deposition of PFAS/PFOS through air emissions must be addressed to stop the cycle of continuing contamination.

NTC is aware of the increased knowledge of the impacts of 6PPD and 6PPD-Q (derived from the interaction of 6PPD and ozone) on important fish populations. Much is still unknown about the interaction of 6PPD and 6PPD-Q in the atmosphere, how it is transported and deposited, and its impact on humans and terrestrial species. NTC will continue to monitor the advancement of knowledge around this pollutant and encourage more research in the air media.

Radon and SIRG: The EPA has been requesting that tribes apply for State and Tribal Indoor Radon Grants (SIRG) funding. However, the application process is difficult. The process needs to be streamlined to give tribes an opportunity to apply. More tribal assistance for the grant application and how and when to incorporate it into a tribal Performance Partnership Grant would be helpful. Currently, only 13 tribes are receiving the grants.

Indoor air: Indoor air continues to be a priority for many tribes and dedicated funding is needed for existing and new tribal air programs. Tribes have a range of indoor-air quality issues, including mold and moisture intrusion. Funding for training, monitoring, inspections, and remediation of air quality issues is important. Education and outreach to inform community members about the importance of addressing indoor air toxics issues from wood burning, household chemicals and pesticides are also important for some tribes. Finally, many remediation activities need to be balanced with weatherization activities to ensure efficient home activities.

Radiation: Plans for high-assay low-enriched uranium reactors and fuel cycles are a growing concern in Indian country. The exploration of the use of mini reactors in old coal power plants or mine locations means exposure could occur in many areas of Indian Country.

Consultation

Interactions with NTC do not substitute for government-to-government consultation, which can only be achieved through direct communications between the federal government and American Indian and Alaska Native tribal governments. The NTC supports tribal sovereignty and aligns with the 1984 Indian Policy, which emphasizes the government-to-government relationship between tribal nations and EPA. The policy commits the EPA to supporting tribal self-governance and working directly with tribal governments on environmental matters.

Funding

The NTC recommends that EPA focus on the crucial needs that have led to greater demands on tribal 103 and 105 grants. For FY 2027, NTC is requesting \$94 million for tribal air programs, an amount that includes an average rate increase, worker wage increase, and equipment cost increase.

Some tribes that receive a one-time infusion of resources to conduct limited work may, over time, lose the staff and capacity supported by this one-time funding. In addition, without an increase to the base program funding, tribes will lose staff capacity for their existing base Clean Air Act programs. We urge EPA to increase funding to the levels necessary to have a meaningful impact in our communities.

Parity in Tribal Data Management

FY 2027 budget request: \$50 million

The NTC is proposing to increase the Exchange Network Program Grant to \$50 million. Data management and partnerships are increasingly important. Although data is cross media, restoring this funding would allow the Tribal Exchange Network Group (TXG) to increase their support to tribes in their data management and sharing capacity. The E-Enterprise Leadership Council (EELC) promotes collaborative processes and tools to support business processes across EPA, tribes, and states, while the

TXG focuses on building tribal information management capacity through training, mentorship, and technical assistance to leverage the tools and solutions of the Exchange Network.

Partnering for Tribal Data Sovereignty – E-Enterprise Leadership Council

The NTC recommends that EPA support and work closely with the EELC. The EELC supports tribes in using innovative approaches to manage their programs, including data to protect the environment. Unlike many other Tribal Partnership Groups (TPGs), the EELC is multimedia in nature, supporting all EPA program offices (air, water, land, compliance, etc.). EELC governance and project work is supported and funded by multiple EPA program projects.

E-Enterprise represents a commitment to a joint governance model that substantially expands the collaboration among the EPA, state, and tribal partners. The EELC provides an opportunity for 10 tribal representatives to participate. The tribal members of the EELC are appointed from among elected officers of tribal governments or their designated employees. The EELC is co-chaired by a tribal, state, and EPA representative. Tribal EELC members serve, as they are able, on EELC workgroups tasked with carrying out EELC priorities, (e.g., QAPP, digital strategy). Through a five-year cooperative agreement, funded by EPA's Office of the Chief Financial Officer, the tribal EELC gets the support they need to participate in EELC work.

Invest in the work of the tribal EELC to support tribal programs in implementing modern and efficient data management systems to collect, analyze, and share environmental data. Although the General Assistance Program supports capacity building for tribal environmental programs, funding is not sufficient to meet needs related to advancing tribal data management and technical capacity.

Provide support for Tribal E-Enterprise. That support will ensure that funds for tribal coordination of E-Enterprise are similar to what is given to the Environmental Council of the States (ECOS) to support state work related to E-Enterprise. These additional funds should be provided directly to tribes to support their participation in E-Enterprise project work, workgroups, and governance groups. Also, funding the next five-year cooperative agreement will support multiple full-time program coordinators and increase current funding levels to an organization that can support the tribal EELC, to offer tribes the same level of support that states receive through the cooperative agreement with ECOS.

Roll out tribal EELC projects to the national level. Funding is needed for efforts to support EPA employees' roll out of tribal EELC pilot projects to the national level. Example: Roll out the Tribal Assessment, Total Maximum Daily Load.

Fund ATTAINS pilot to support ATTAINS participation for all tribes in the nation. Funding can be used to identify other successful local programs that could be rolled out nationally to tribes.

Include an EELC line item in the EPA budget. An EELC line item should be included in the EPA budget for FTEs to support tribal EELC participation (e.g., on the leadership council and in workgroups and projects). These funds could be added into Performance Partnership Grants or other agreements to support tribal staff participation in important workgroups that affect day-to-day activities in tribal

environmental programs. Recruitment and retention are two challenges that tribes face when participating in national workgroups, and funding to support these efforts is a priority.

Tribal Data Collection and Management—Tribal Exchange Network Group

The NTC requests that EPA support tribal data collection and management with increased funding through the EPA Office of the Chief Financial Officer Cooperative Agreement to support the EELC and the TXG. While many tribal partnerships are media-specific, the TXG focuses its activities on supporting tribal priorities to advance and support tribal involvement in the Exchange Network (EN) through direct outreach to, support for, and engagement with tribal environmental programs, and to enhance those programs by offering capacity-building resources that expand tribal environmental data and information management capabilities. Additionally, the TXG aims to inform the EPA and other EN partners from across various environmental media program areas and regions about the unique considerations of tribal lifeways, environmental protection and natural resource management on tribal lands, issues regarding information technology and data management systems that impact tribal environmental programs, and the importance of respecting tribal sovereignty. Finally, TXG works to make sure that tribal lifeways perspectives and concerns are considered when determining EN-related funding priorities and management decisions. The NTC recommends that EPA do the following:

Enhance tribal capacity. Enable TXG to serve as an incubator for training and technical assistance in tribal environmental data and information management. Tribal agencies need relevant training and mentoring resources for managing and communicating environmental data more efficiently through technology solutions. Developing and expanding training resources, specifically for tribal staff working in environmental data management and information technology topics, is a need identified by the TXG, and the demand for training and mentoring support for tribes has been evidenced by participation levels at recent workshops conducted by ITEP and the TXG. The TXG aims to support tribes at all levels of data management by continuing to offer and improve training resources for tribal staff. In addition to increasing funding for TXG-supported training, the EPA should work internally and with tribal partners to identify existing support resources, along with gaps and areas where improvements may be needed. The EPA should also continue to support the development and expansion of these trainings, along with opportunities to foster communities of practice for tribal professionals working on data management issues.

Establish a community of practice for tribal environmental professionals in the areas of environmental data management and sharing. The TXG provides vital support for tribal environmental professionals by providing a safe community of practice for idea-sharing and advocacy through the Tribal Exchange Network Conference (TENC) and ongoing monthly support calls. TXG communities of practice, such as TENC, are important pathways to relationship-building between tribal nations and their environmental programs, and as such, provide compounding opportunities for data management, collaboration, and environmental improvements between nations.

Provide one-on-one support, which has proven to be valuable to tribal environmental professionals, through tribal assistance and mentorship. The ever-changing suite of technology and federal

environmental data sharing regulations and recommendations requires ongoing education and support. One-on-one knowledge sharing through the TXG provides an opportunity for tribal environmental professionals to get tailored, personalized advice and guidance and on-demand support in the building and maintenance of their environmental programs. This customized training also fills a large gap in the operations and maintenance of environmental programs where existing budgets or grant constraints are unable to meet ongoing training demands and or environmental data management support.

Advocate for Tribal Parity in Funding and EPA support

EPA should cover operations and maintenance (O&M) costs under EPA grant programs, including the Exchange Network Grant Program. Tribal agencies need practical solutions that are accessible to small programs with limited technical infrastructure, such as cost-sharing strategies leveraged by EPA, or direct support for the development of software tools and systems that meet tribal needs.

To offset and help support O&M costs—thereby aiding the long-term success of tribal activities developed under EN grants and producing an even greater return on investment of EN funding over time—EPA should implement strategies for sustainable funding resources and increase funding levels to provide equal opportunities to all tribes and expand their access to and adoption of EN-invested resources.

To make sure the future governing structure of the EN serves tribes and tribal information technology and data management needs and to fully realize the potential of the EN for all partners, the EPA should renew its focus on the foundational goals of supporting all levels of data management and establishing data standards that support the sharing of data between tribes, states, and the EPA. Many of the EN's current interests focus on next-generation technologies, while many tribes are still working toward standardizing their data practices and or using spreadsheets and manual data entry in their environmental departments. This not only leaves smaller tribal programs behind, but also results in incomplete or inadequate information for decision making, which is particularly important for risk communication and public information needs.

EPA needs to ensure tribal parity of funding and increase support for the creation of nationwide tribal environmental organizations, just as states have in the Environmental Council of the States (ECOS). While the TXG is an important resource for tribes and tribal environmental professionals and programs, it does not and cannot serve in the same function and capacity as the ECOS. Beyond the large disparity in funding between TXG and ECOS, there is a wide gap between the workplans of the two, as the work of ECOS extends well beyond supporting the EN and its members' involvement. Tribes, like states, could benefit greatly from a tribally-led organization aimed at supporting tribes and tribal environmental departments in all program and policy areas.

Ensure Safety of Chemicals for People and the Environment

FY 2027 budget request: \$25.54 million

\$10 million for a new TSCA regional program

\$3 million for EPA authorized for renovation and repair innovation programs

\$2 million for EPA lead programs including tribal-focused grants

\$1.5 million for tribal community outreach on toxic release inventory facilities and tools

\$9.04 million for tribal pesticide programs

Toxics

The NTC requests \$16.5 million to ensure chemical and pesticide safety for Tribal Beneficial Uses (TBUs) and the health of tribal people. The NTC requests this sum to ensure chemical safety, prevent pollution, and protect traditional food sources, medicines, and cultural practices. Because tribes rely on healthy, safe ecosystems to sustain their Indigenous lifeways, health, and treaty rights, and to provide the natural resources used in tribal cultural practices, they are increasingly subject to disproportionate impacts from toxic chemicals that are released to the environment. This includes access to clean water, healthy traditional food sources, natural medicines, pesticide- and herbicide-free indigenous plants for weaving, and contaminant-free clay for pottery. Tribal ecosystems have been degraded by legacy contaminants and the continued release of recognized but unregulated chemicals like flame retardants and endocrine-disrupting compounds. Therefore, the NTC asks that EPA fund the following priority issues:

Increase support for the Toxic Substances Control Act (TSCA) Lead Program among tribes. The Lead Program is the only TSCA program that tribes have the authority to administer and implement, but it is severely underused by tribal governments. Local implementation is essential. NTC also recommends that EPA provide additional outreach and technical assistance to tribes on the TSCA Section 402/404 Lead-Based Paint Renovation Programs and fund a national tribe-to-tribe mentor program to engage more tribes in administering these programs.

- Set-aside funding for tribes to engage in monitoring of exposure pathways through fish and plants in locations of tribal significance to inform TSCA risk evaluations, including new chemicals.
- Conduct regional workshops for tribes on the TSCA Lead Program, including application processes, best practices, and technical aspects.
- Establish a mentor program connecting experienced tribes with those new to the program.
- Assign dedicated EPA staff members to serve as liaisons for tribes interested in the TSCA Lead Program.

Provide funding for tribes to educate tribal citizens and community members on the dangers that toxics pose to communities throughout Indian Country, using updated materials and working with the Toxics Release Inventory program.

- Include tribal lifeways, Indigenous knowledge, and unique exposure in risk assessment work. Establish a process for early consideration of tribal lifeways in EPA risk assessment and management work and add tribal lifeways to the *Exposure Factors Handbook*.
- Assist tribes with tribal exposure scenarios. While the NTC appreciates that EPA recognizes tribal sovereignty, it is often difficult to incorporate tribal exposure scenarios into federal and state policies. Studies related to Indigenous lifeways are often politicized, criticized, and manipulated by the non-tribal public because it can be difficult to understand subsistence cultures in an age of increasing consumerism. Tribes need EPA program support as they continue to seek to

evaluate the impact of toxic chemicals on traditional practices and resources for usual and accustomed hunting, fishing, and gathering sites.

- Identify tribe-specific exposures to toxics. National chemical risk management policies must fully consider tribal exposure data, existing body burden levels, and data assessing the risks to tribes. The NTC recommends funding for tribes to conduct toxics monitoring, risk assessments, and bio-monitoring studies, including results for unique tribal chemical exposures. Supplemental funding is needed to perform the information gathering that EPA currently requires to evaluate whether risk management actions are effectively protecting subsistence lifeways.

Develop local ordinances. The NTC recommends that EPA fund training and media-specific technical assistance for tribal governments and staff on ordinance development to reduce the exposure of tribal citizens to chemicals in consumer products and community building and housing materials, as well as post-disposal. In the interest of cooperative federalism, EPA must also support the implementation of tribal ordinances and regulations once they have been developed.

Network, collaborate, and provide outreach with and to tribes through the National Tribal Toxics Council (NTTC). EPA's tribal partnership groups, like the NTTC, are vital links between EPA and tribal communities. Increased funding is needed for the NTTC to develop outreach materials that engage tribal communities in chemical management. Currently, complex technical subjects are not explained in lay terms within these materials. Additionally, the NTC recommends providing funds for tribal training to build basic "program capacities related to the federal asbestos, pesticides, and toxics programs and evaluate the type of related issues that may be facing the community," as recommended in GAP guidance. Training is essential for tribes to learn how to gather relevant data they can use to make program development decisions. Training should include engaging tribal communities on chemical safety and pollution prevention issues.

Promote pollution prevention in Indian Country. To achieve this goal in Indian Country, the NTC recommends that EPA:

- Conduct a comprehensive needs assessment to identify specific tribal challenges and priorities related to pollution prevention.
- Prioritize the implementation of pollution prevention (P2) solutions specific to tribal needs by developing P2 program policies and procedures that make use of available tribal exposure data and existing body burden levels, and by developing P2 program priorities that align with tribal community P2 priorities.
- Provide multiyear grant resources for tribe-specific P2 grants that waive all fund-matching requirements and fund toxic source and waste reduction activities to enhance the implementation of integrated solid waste management programs in Indian Country.
- Launch pilot projects in collaboration with tribes to demonstrate the effectiveness of P2 solutions tailored to our needs.
- Develop grant programs for tribes to implement P2 initiatives in their communities.

Pesticides

The NTC is proposing a \$9.04 million budget package to increase and reallocate funding specifically to supporting Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) pesticide cooperative agreements with tribes in Regions 1, 2, 3, 4, and 7, as well as to expand its direct implementation responsibilities and maintain its existing agreements and partnerships with effective programs in Regions 5, 6, 8, 9, and 10. The NTC requests this sum for the Tribal Pesticide Program (under FIFRA) as a direct implementation package and for existing programs.

Restricted-use pesticides were used and sold in Indian Country illegally for decades without regulatory oversight. The federal certification and training plan now provides licenses and oversight through 24 cooperative agreements. Significant quantities of general and restricted-use pesticides are used in Indian Country for agricultural crops, non-agricultural buildings, and structures (e.g., power lines, roads, casinos, hotels, schools). Pesticides are used to prevent disease and to control bacteria and fungi in hospitals and other areas. In addition, they are used to manage invasive weeds to preserve pristine areas for recreation and sustenance gathering areas. In 2011, EPA piloted a federal certification program stating that within the boundaries of Indian Country, one must have certification to use pesticides. However, there is an overwhelming enforcement gap. The NTC makes the following requests:

Address issues in pollinator decline. The NTC asks that EPA continue to fund and provide technical assistance to tribes in developing and implementing pollinator protection plans in accordance with EPA guidance.

- Implement regulatory actions to make sure the bee industry complies with licensing, training, recordkeeping, and proper use of pesticides in addition to other best management practices.
- Organize training programs for tribal land management personnel on pollinator-friendly habitat restoration techniques.
- Establish seed banks and native plant propagation programs to support pollinator populations on tribal lands.
- Create a platform for tribes to share successful strategies and lessons learned in addressing pollinator decline.

Increase tribal pesticide funding. Provide full funding to tribes for pesticide-related activities.

- Establish regional training centers focused on pesticide safety, application, and compliance for tribal personnel.
- Develop data-sharing agreements between tribes, EPA, and universities to facilitate the creation of more accurate risk assessment models including tribal lifeways.
- Continue to support the Tribal Pesticide Council (TPC).

Enforcement and compliance. Expansion of programs in areas where there is limited or no existing coverage of Indian Country and increase funds to retain and maintain existing tribal programs.

- Collaborate with tribes to develop standardized enforcement protocols for pesticide use in Indian Country.
- Offer training and resources to bolster tribal enforcement capabilities, including investigation techniques and recordkeeping.

- Conduct joint enforcement actions with tribes to address violations and deter illegal pesticide use.
- Make sure tribes have access to the same technological tools the state inspectors have. This includes database and tracking software.

Enforcement of and Compliance with Tribal Environmental Laws

FY 2027 budget request: \$105.5 million

The NTC asks that EPA provide \$105.5 million for GAP funds, increasing the GAP funding formula base at \$183,750 per tribe. This adjustment would enable tribes to establish and implement environmental protection programs under Section 502(d) (1) of the Indian Environmental General Assistance Program Act (as amended) and as Congress intended. This adjustment would also increase tribal capacity to monitor and protect local environments and enforce their regulations. The NTC further recommends that EPA do the following:

Incorporate tribal risks in risk assessments. EPA should develop and implement an agency-wide policy to include all unique tribal risks prior to conducting program risk assessments.

Allocate funds based on numbers of tribal inspectors. EPA should provide funding to each region, based on the number of federally credentialed tribal inspectors, to support tribal and EPA compliance assurance and monitoring activities. EPA should also support an increase in tribal inspectors over time.

Promote EPA’s enforcement and compliance support to tribes. EPA should increase awareness of the compliance and enforcement assistance available to tribes from the EPA Office of Enforcement and Compliance Assurance.

Address the most highly exposed and disproportionately impacted populations. EPA should develop and implement a formal, agency-wide directive for evaluating tribal exposure pathways to address these populations. NTC recommends including tribal exposure pathways in risk assessments of toxic chemicals and in clean-up standards. The NTC believes that institutionalizing the evaluation of tribal exposure pathways is a priority for:

- Air quality,
- Water quality,
- Clean-up standards for contaminated sites,
- The assurance of safety of chemicals, and
- Environmental enforcement and compliance.

Remain engaged with tribes on a government-to-government basis. The NTC recommends that EPA:

- Continue participating in tribal meetings and conferences.

- Institutionalize the consistent implementation of the EPA’s Guidance for Discussing Treaty Rights in order to consider treaty rights and cultural resources in all EPA decisions.
- Make sure that cooperative agreements and memoranda of understanding with states include a requirement to “consult and coordinate with tribes.”
- Recognize the nation-building aspect of tribal governments and associated challenges to sustainability.
- Increase and document the use of Indigenous knowledge and Tribal Beneficial Uses as defined by tribes by engaging tribes earlier in the decision-making process.

Strengthening Our Partnerships to Advance Cooperative Federalism

FY 2027 budget request: \$542.54 million

There are 574 federally recognized tribes in the United States, with a collective population of more than one million people who are both tribal citizens and U.S. citizens. Indian Country consists of about 70 million acres, which equals 4% of the total U.S. land base. Tribes face many disparities, such as disparate ambient air quality, drinking water quality, or solid waste management mechanisms. EPA has a role to play in ensuring parity between tribes and states to improve human health and the environment in Indian Country. For EPA to fully achieve a new era of partnership with tribes, several considerations related to tribal funding must be addressed. EPA must act with urgency to resolve chronic underfunding that results in environmental protection implementation challenges for tribes.

Another important partnership consideration is tribal sovereignty. The NTC asks that EPA continue to recognize each unique and separate tribal government as the appropriate and primary authority over all reservation lands, habitats, and ecosystems. The NTC recommends that EPA enable effective tribal data management and promote data sovereignty by continuing to support the EELC and the TXG.

Finally, the NTC requests that AIEO-facilitated funding from EPA program offices be provided to support the NTC with the mission of the NTOC to serve as a forum for federally recognized tribes. Working with EPA senior leadership on policy and resource matters related to tribal capacity building, environmental program development, and implementation will help identify mechanisms for tribes and EPA to facilitate actions that protect human health and the environment in Indian Country.

Conclusion

The NTC respectfully calls on EPA Administrator Lee Zeldin and agency leadership to embrace a new era of partnership—one that fully integrates tribal priorities into the agency’s strategic vision, including Powering the Great American Comeback. Tribal governments are ready and willing to lead environmental protection efforts across Indian Country, but they must be equipped with full funding, technical support, and regulatory authority.

EPA’s comeback strategy cannot succeed without tribal inclusion. Clean air and water, energy resilience, permitting reform, and data modernization all depend on tribal engagement and leadership. By investing in tribal capacity and honoring the government-to-government relationship, EPA can fulfill its trust responsibility and ensure that tribal communities are not left behind—but instead are empowered to shape the environmental and economic future of this nation.

The NTC looks forward to continued collaboration with EPA through AIEO and other program offices. Together, we can build bridges across jurisdictions, strengthen cooperative federalism, and protect the cultural, spiritual, and natural resources that sustain tribal lifeways. The time to act is now—and the path forward must include Indian Country at the center of the comeback.