



**EPA Region 10 Tribal Operations Committee (RTOC)
P.O. Box 689
Spokane, Washington 99210
www.region10rtoc.net**

January 16, 2024

Matthew Tejada
Deputy Assistant Administrator for Environmental Justice
Office of Environmental Justice and External Civil Rights
US Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

SENT VIA REGULATIONS.GOV

RE: EPA's Meaningful Involvement Policy

Dear Mr. Tejada:

This letter is sent on behalf of the Tribal Caucus members of EPA Region 10's Tribal Operations Committee ("RTOC"). This letter is not sent on behalf of EPA Region 10 or any employees of EPA, but solely tribal government representatives of the RTOC. This letter is sent regarding the Environmental Protection Agency ("EPA") proposed Meaningful Involvement Policy.

The RTOC strongly supports EPA's efforts to develop the updated Meaningful Involvement Policy. The Policy contains positive steps to increase and improve public participation in EPA's decision-making processes.

The RTOC does have some minor comments that should be included in the finalization of the document:

- The Policy should clarify that public participation efforts such as hearings and comment opportunities cannot substitute for government-to-government consultation with Tribes.
- The Policy should clarify that coordination with Tribal members and/or non-governmental Tribal organizations is not substitution for government-to-government consultation and that neither individual Tribal members or non-governmental groups can speak on behalf of Tribal Government.

- There have been several new and updated policies governing consultation and coordination with Tribe that should be references, such as the December 7, 2023 EPA Policy on Consultation with Indian Tribes.¹

The RTOC appreciates your consideration of these comments.

Sincerely,

Raymond E. Paddock III

Raymond E. Paddock III
Central Council of the Tlingit and Haida Indian Tribes of Alaska
Region 10 Tribal RTOC Chair

¹ Available at <https://www.epa.gov/system/files/documents/2023-12/epa-policy-on-consultation-with-indian-tribes-2023.pdf>.