

# National Indian Health Board



*Transmitted via e-mail: [Environmental\\_Justice@ios.doi.gov](mailto:Environmental_Justice@ios.doi.gov)*

May 27, 2016

Secretary Sally Jewell  
U.S. Department of the Interior  
Office of Environmental Policy and Compliance (MS-2462)  
1849 C Street NW  
Washington, DC 20240

**Re: U.S. Department of the Interior Environmental Justice Strategic Plan 2016-2020**

Dear Secretary Jewell:

On behalf of the National Indian Health Board (NIHB), I write to submit comments on U.S. Department of the Interior Environmental Justice Strategic Plan 2016-2020.

Established in 1972, the NIHB is an inter-Tribal organization that advocates on behalf of Tribal governments for the provision of quality health care to all American Indians and Alaska Natives (AI/ANs). The NIHB is governed by a Board of Directors consisting of a representative from each of the twelve Indian Health Service (IHS) Areas. Each Area Health Board elects a representative to sit on the NIHB Board of Directors. In areas where there is no Area Health Board, Tribal governments choose a representative who communicates policy information and concerns of the Tribes in that area with the NIHB. Whether Tribes operate their entire health care program through contracts or compacts with IHS under Public Law 93-638, the Indian Self-Determination and Education Assistance Act (ISDEAA), or continue to also rely on IHS for delivery of some, or even most, of their health care — the NIHB is their advocate.

American Indians and Alaska Natives (AI/AN) have long experienced lower health status when compared to other Americans and they continue to experience disproportionate health disparities. Poor environmental quality has its greatest impact on those whose health status is already at risk. Environmental crises like water and air pollution, toxic waste contamination, oil spillage in the Mexican Gulf and Alaskan Basin, land forest degradation, and fracking in Montana and the Dakotas, all contribute to the health disparities suffered by AI/AN. As a result, it is essential that the U.S. Department of the Interior engage, consult, and consider AI/ANs when making policy. As sovereign nations, Tribes are responsible for the overall health and well-being of their members and they have a significant stake in the environmental policies affecting their communities. As a result, NIHB is grateful for the opportunity to comment and provide modifications and/or additional objectives for goals 1-4 on the DOI's Environmental Justice Strategic Plan draft, below.

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Goal 1: Ensure responsible officials are aware of the provisions of Executive Order 12898 and are able to identify and amend programs, policies, and activities under their purview that may have disproportionately high and adverse human health or environmental effects on minority, low-income, or Tribal populations.

- Ensure all outreach to Tribal communities is done in a culturally appropriate and mutually beneficial way.
- Targeted outreach to Tribal communities on federal programs and activities.

Goal 2: Ensure minority, low-income, and Tribal populations are provided with the opportunity to engage in meaningful involvement in the Department's decision making processes.

- Ensure ample time and notice for *meaningful* Tribal consultation early and throughout program and planning activities and NEPA processes as required by Executive Order 13174 and confirmed in the President's memorandum of November 5, 2009.
- Establish working partnerships with Tribes as well as regional (e.g. Area Indian Health Boards, Inter-Tribal organizations) and national (e.g. National Indian Health Board) Tribal organizations.
- Conduct public meetings, listening sessions and forums that are mutually beneficial in Tribal communities.

Goal 3: The Department will, on its own or in collaboration with partners, identify and address environmental impacts that may result in disproportionately high and adverse human health or environmental effects on minority, low-income, or Tribal populations.

- Consider traditional knowledge and practices when planning effectively for changes that could disproportionately affect Tribal populations.
- Enhance- rather than consider enhancing- mitigation and monitoring efforts in the planning processes to lessen any disproportionate environmental, social, and economic impacts on Tribal communities through Tribal consultation and collaboration with Tribes as well as regional (e.g. Area Indian Health Boards, Inter-Tribal organizations) and national (e.g. National Indian Health Board) Tribal organizations.
- Establish working relationships or memoranda of understanding/memoranda of agreement with Tribal colleges to further environmental justice goals and further develop special expertise and knowledge to address environmental justice goals in Tribal communities.

Goal 4: Use existing grant programs, training, and educational opportunities, as available, to aid and empower minority, low-income, and Tribal populations in their efforts to build and sustain environmentally and economically sound communities.

- Develop, implement, and promote culturally competent communication strategies through targeted outreach to inform Tribal populations of DOI's programs, policies and activities.
- Consult with local community groups and Tribes to ensure that outreach programs are accessible.

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- Assist Tribal populations in developing and expanding programs that promote healthy ecosystems and value traditional knowledge.

The National Indian Health Board urges the U.S. Department of the Interior to consult with Tribes and Tribal organizations in a culturally appropriate and mutually beneficial manner to ensure environmental burdens are reduced, barriers to participate in decision making are removed and access to environmental benefits that help make communities safe, vibrant and healthy places to live in, work in all Tribal communities.

We appreciate the DOI for their continued efforts to engage Tribes and improve the livelihood of Indian Country. Additionally, we encourage the DOI to maintain and build on their relationship with key Tribal stakeholders, and continue striving for better health outcomes. Thank you again for this opportunity to comment. Please contact Devin Delrow, NIHB Director of Federal Relations at [ddelrow@nihb.org](mailto:ddelrow@nihb.org) if you have any questions on the concerns raised above.

Sincerely,



Lester Secatero  
Chairman, National Indian Health Board