



May 21, 2026

Honorable Lee M. Zeldin  
Administrator  
Environmental Protection Agency  
Mail Code 1101A  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**Re: Comments on the Draft FY2026-2030 EPA Strategic Plan 4.29.26**

Dear Administrator Zeldin,

The National Tribal Air Association (NTAA) submits this letter to provide comments on the U.S. Environmental Protection Agency's (EPA) Draft FY2026-2030 EPA Strategic Plan 4.29.26.

The NTAA is a member-based organization with 162 principal member Tribes. The organization's mission is to advance air quality management policies and programs, consistent with the needs, interests, and unique legal status of Indian Tribes. As such, the NTAA uses its resources to support the efforts of all federally recognized Tribes in protecting and improving the air quality within their respective jurisdictions. Although the organization always seeks to represent consensus perspectives on any given issue, it is important to note that the views expressed by the NTAA may not be agreed upon by all Tribes. Further, it is also important to understand interactions with the organization do not substitute for government-to-government consultation, which can only be achieved through direct communication between the federal government and Indian Tribes.

The NTAA has reviewed the Agency's Draft FY2026-2030 Strategic Plan. The NTAA recognizes that the Strategic Plan reflects the President's executive orders and the Administrator's 5 pillars as the Priority goals for years:

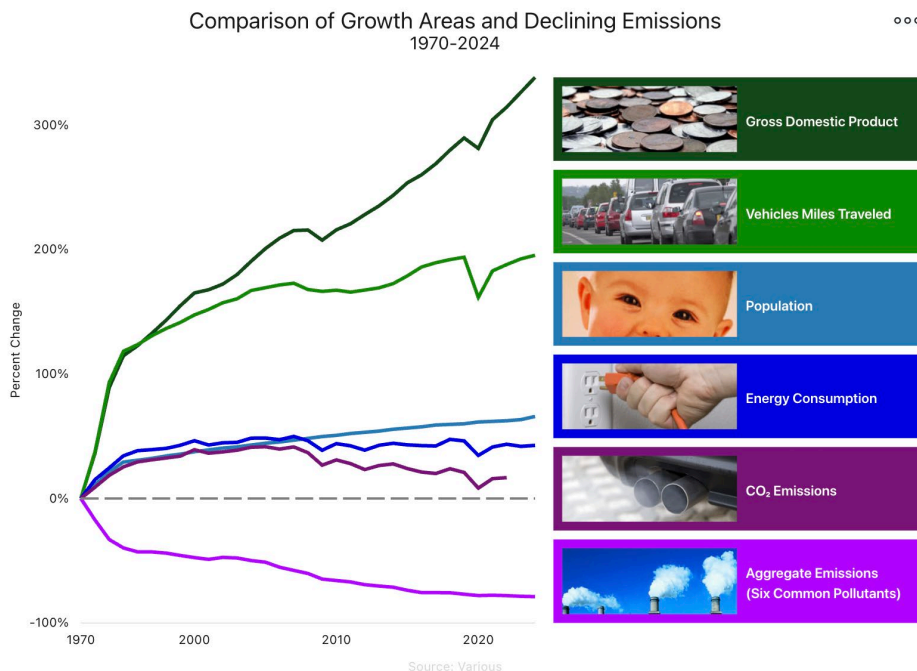
1. Clean Air, Land, and Water for Every American
2. Restore American Energy Dominance
3. Permitting Reform, Cooperative Federalism, and Cross-Agency Partnership
4. Make the United States the Artificial Intelligence Capital of the World
5. Protecting and Bringing Back American Auto Jobs.

With two additional 2-year Priority goals including:

1. Advance Investment into America and Job Creation through Permitting Reform. By September 30, 2027, streamline the permitting process and improve efficiencies so the Nation can unleash economic growth while providing cost savings to hardworking Americans.
2. Reduce Per- and Polyfluoroalkyl Substances (PFAS) Risks to the Public. By September 30, 2027, strengthen the science, fulfill statutory obligations, enhance communication, and build partnerships.

NTAA is concerned that of the Agency’s 5 goals and 2 priorities, only one goal and one priority focus on the central mission of the Agency, which is “protecting human health and the environment.” NTAA is also concerned that the Strategic Plan is more reflective of the executive orders than the underlying statutes that instruct EPA’s actions.

The NTAA appreciates that one of the two priorities includes a focus on PFAS risk reduction, and Goal 1’s continued focus on protection of the environment by providing clean air, land and water. NTAA also appreciates that in this goal, the Strategic Plan recognizes that public health and environmental protection are central to the mission of the Agency. NTAA acknowledges that clean air and environmental protection go hand in hand. As recognized in the Strategic Plan, there have been significant reductions in ambient air pollutants since the establishment of the Agency in 1970, all occurring with the EPA and its partners by providing strong regulations, permitting and enforcement. This has happened all while there was significant growth in the economy as indicated in EPA’s 2024 Air Quality Trends report<sup>1</sup>.



<sup>1</sup> EPA *Our Nation’s Air* <https://gispub.epa.gov/air/trendsreport/2019/#growth>

The NTAA also supports the Agency's priority of cooperative federalism and providing resources, training, and capacity building to the agency's regulatory partners. Funding support is particularly important for Tribes.

As mentioned above, the NTAA believes the Strategic Plan is out of balance with less emphasis on the core mission of the Agency, and more emphasis easing the environmental requirements for polluters. This is demonstrated in goals 2, 4 and 5, where the emphasis is deregulation, rather than air quality and human health protection. Goal 3, permitting streamlining, although a laudable goal, is appropriate only if that streamlining does not reduce the regulatory requirements, and appropriate monitoring, recordkeeping and reporting necessary for accountability from the sources.

While NTAA agrees that PFAS is a significant pollutant that poses a major health risk to the public and the environment, NTAA questions the seriousness the Agency gives to priority 2. The Strategic Plan only discusses PFAS exposures from the water pathway, where new studies demonstrate that PFAS contamination can come from air deposition as well. In addition, the Agency did not include this priority in its Draft Evidence Plan for evaluation, and the Agency reduced the number of PFAS forms on the water contaminant lists. The NTAA encourages EPA to strengthen its priority to reduce PFAS risks by addressing these limitations.

The NTAA appreciates the opportunity to submit these comments and looks forward to further work with EPA on this important issue. If you have any questions or would like additional information please contact Miranda O'Neill, NTAA Program Manager, [Miranda.ONeill@nau.edu](mailto:Miranda.ONeill@nau.edu).

Respectfully,

Syndi Smallwood  
Chair  
National Tribal Air Association

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