



**EPA Region 10 Tribal Operations Committee (RTOC)**  
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May 22, 2026

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

**RE: Draft FY 2026–2030 EPA Strategic Plan**

Dear Administrator Zeldin:

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 in response to the U.S. Environmental Protection Agency's ("EPA") Draft FY 2026–2030 EPA Strategic Plan ("Plan").

A clean environment is essential to many Tribes, not just as a source of sustenance, but also for cultural, medicinal, and spiritual reasons. The RTOC strongly believes that EPA must engage in consultation on a government-to-government basis with tribal governments to fully understand the impact of the Plan on treaty rights, tribal communities, and tribal resources.

The RTOC has identified the following comments on the Plan:

**Goal 1: Objective 1.1 – Healthy Air Quality:** The RTOC appreciate EPA's recognition that the agency will "work together with states and Tribal partners to empower local decision-making" and encourage Tribal participation in CASAC advisory activities. The RTOC is concerned that that the Plan does not reference Tribal treaty and trust rights, cultural uses, or cumulative impacts on tribal resources. The RTOC recommends that this section include objectives that: (1) support Tribal air programs and TIP development; (2) ensure Tribes have equal access to monitoring resources; and (3) protect Tribal air quality when States fail to act.

**Objective 1.2 – Clean and Safe Water:** RTOC strongly support EPA's commitment to providing technical assistance to "states, Tribes, and communities" to address water infrastructure, PFAS

contamination, cybersecurity, and emergency response. The object needs to acknowledge Tribal reserved water rights or trust and treaty-protected fisheries. The objective should affirm Tribal role in implementing Clean Water Act programs (TAS) and expand funding for Tribal water infrastructure and operator certification.

**Objective 1.3 – Revitalized Land and Contamination Prevention:** The RTOC appreciates EPA’s commitment to strengthening coordination with “federal, state, Tribal, and local agencies” in emergency response and cleanup programs. RTOC believes that the Good Samaritan Act implementation must include Tribal consent when projects affect Tribal lands, waters, or downstream communities. The objective should: (1) require Tribal consultation and consent for cleanup or reclamation activities affecting Tribal resources; (2) prioritize cleanup of contaminated sites impacting Tribal communities; and (3) expand Tribal access to Brownfields and Superfund funding.

**Objective 1.4 – Chemicals in the Environment:** The RTOC appreciates the inclusion of Tribes in communication and training efforts related to TSCA and FIFRA. The objective should address Tribal exposure pathways (subsistence fishing, traditional foods, cultural uses). The RTOC also recommends that the objective incorporate Tribal exposure scenarios into TSCA risk evaluations, ensure Tribes receive early notice and consultation on chemical decisions, and expand Tribal access to chemical data and monitoring tools.

**Objective 1.5 – Compliance and Enforcement:** The RTOC strongly support EPA’s acknowledgment that “only the federal government is enforcing federal environmental law” in most of Indian Country and that federal enforcement remains essential. A strong federal presence is often the only mechanism available to address persistent environmental and public-health risks in Tribal communities. The RTOC recommends that EPA maintain a strong federal enforcement presence in Indian Country, support Tribal pathways to TAS, delegation, and independent enforcement authority, ensure enforcement decisions incorporate Tribal reserved rights and cultural resource protections, and prioritize enforcement where Tribal communities face elevated environmental and

**Goal 2: Restore American Energy Dominance:** The RTOC appreciate the Plan’s acknowledgment that high energy costs disproportionately affect families, farmers, and small businesses. This framing aligns with Tribal concerns about affordability and energy burden in rural and remote communities. The Goal needs to reference Tribes and the significant implications for Tribal lands, waters, and treaty and trust rights. The goal should include an explicit commitment to Tribal consultation on energy projects and a commitment to protect Tribal treaty and trust rights and cultural resources.

**Goal 3: Objective 3.1 – Incentivized Investment (Permitting Reform):** The RTOC appreciate the Plan’s recognition that predictable, timely permitting processes support community development and infrastructure investment. The commitment to track progress through public reporting aligns with Tribal priorities for clear, accessible information on federal actions that affect Tribal lands and resources. The objective should require Tribal consultation early in the permitting process and ensure Tribes have adequate time and resources to review permits. The objective should include Tribal governments as recipients of training, communication, and technical assistance related to new chemicals.

**Objective 3.2 – Cooperative Federalism:** The objective should provide that state discretion does not override Tribal sovereignty or treaty and trust rights and expand Tribal representation on SAB, CASAC, and other advisory bodies.

**Objective 3.3 – Organizational Excellence:** RTOC appreciates the recognition that effective environmental governance requires collaboration across federal partners — a long-standing Tribal priority to reduce duplication and conflicting requirements. The objective lacks Tribal references, despite the importance of grants management, workforce development, and data modernization to Tribal programs. The objective should include Tribal-specific capacity-building commitments.

**Goal 4: Make America the Artificial Intelligence Capital of the World:** The RTOC acknowledges the emphasis on innovation, efficiency, and modernized infrastructure, noting that these priorities have implications for federal-Tribal engagement, environmental decision-making, and Tribal participation in emerging technology sectors. The RTOC appreciates EPA’s commitment to collaborating with “industry, state, and Tribal leaders” on data center siting.

**Objective 4.1 – Powering AI:** The objective should acknowledge that data centers are water-intensive and may strain Tribal water resources. Protections for Tribal environmental, cultural, or geospatial data used in AI systems are not addressed, creating risks of misuse or disclosure without Tribal consent. The objective should require Tribal consultation for AI infrastructure affecting Tribal lands or waters and ensure Tribes benefit from AI-related economic opportunities.

**Goal 5: Bring Back and Protect American Auto Jobs:** The RTOC supports the focus on affordability, regulatory clarity, and economic stability. These priorities support Tribal citizens, Tribal governments, and Tribal enterprises that rely on reliable, cost-effective vehicles for daily life, emergency response, and economic development. However, this Goal contains no Tribal references, despite significant implications for Tribal sovereignty and regulatory authority of eligible Tribes. Deregulation of vehicle emissions may worsen air quality in Tribal communities. This goal should contain explicit commitments to Tribal consultation and include Tribes in transportation and emissions planning.

The RTOC appreciates your consideration of these comments and specifically requests that EPA provide an update on this proposal at one of its meetings.

Sincerely,



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Central Council of the Tlingit and Haida Indian Tribes of Alaska  
Region 10 Tribal RTOC Chair