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U.S. Environmental Protection Agency
Office of Congressional and Intergovernmental Relations
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Request for Feedback on EPA's Draft 26-30 Strategic Plan

The National Association of State Departments of Agriculture (NASDA) appreciates the opportunity to provide comments on the United States Environmental Protection Agency's Request for Feedback on the 2026-2030 Draft Strategic Plan.

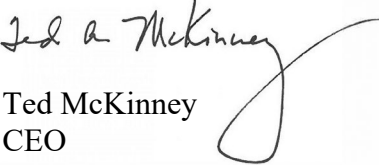
NASDA represents the commissioners, secretaries, and directors of the state departments of agriculture in all fifty states and four U.S. territories. State departments of agriculture (SDAs) are responsible for a wide range of programs, including conservation, environmental protection and pesticide regulations. As coregulators with EPA, we are uniquely positioned to share constructive feedback.

In the spirit of co-regulation, NASDA appreciates EPA's continued support for and recognition of the role cooperative federalism plays in implementing environmental regulation. We appreciate the inclusion of cooperative federalism as one of the five core pillars of the "Powering the Great American Comeback" initiative and as part of Goal 3. To that end, NASDA encourages EPA to continue prioritizing early engagement, consistent communication, and robust support for all appropriate state co-regulatory agencies, including state departments of agriculture. While SDAs are not always the primary regulatory authority on all environmental issues, they remain critical partners in communicating with and regulating farms, ranches, and rural communities.

In the following pages, NASDA shares its perspective, reflecting both its organizational priorities and direct input from NASDA members on this draft strategic plan. We look forward to continuing to discuss these shared priorities throughout this process. If you have any questions, please contact Patrick Wade, Patrick.Wade@NASDA.ORG, or Logan Moss, Logan.Moss@NASDA.ORG.

Thank you again for the opportunity to provide feedback.

Sincerely,


Ted McKinney
CEO
NASDA

Goal 1: Provide Clean Air, Land and Water for Every American

Objective 1.1 – Healthy Air Quality

- NASDA supports EPA’s emphasis on improving air quality outcomes through practical, science-based approaches. NASDA encourages EPA to continue collaborating with USDA and state departments of agriculture to advance voluntary, incentive-based conservation programs and technical assistance, and to ensure that future regulatory actions affecting agriculture recognize the unique nature of agricultural emissions and are grounded in sound science.

Objective 1.2 – Clean and Safe Water

- NASDA supports EPA’s emphasis on cooperative federalism and empowering states and Tribes to address their unique water challenges. The Clean Water Act established a cooperative framework in which states retain the primary responsibility for planning, developing, and managing water resources.
- NASDA supports EPA’s continued focus on technical assistance, water infrastructure resilience, and emergency preparedness. NASDA encourages EPA to continue outreach and coordination with SDAs on both point and nonpoint source water quality challenges impacting agricultural communities.
- NASDA is encouraged by EPA’s emphasis on cybersecurity preparedness for water systems and encourages EPA to identify additional opportunities for coordination with state and federal law enforcement partners to strengthen water system resilience and emergency response capabilities, particularly within rural water systems.
- NASDA encourages EPA to continue working with USDA and SDAs to advance voluntary, incentive-based conservation programs and technical assistance that improve water quality and water resilience while maintaining economically viable agricultural production practices.
- NASDA supports practical, science-based, and cost-effective water quality policies that provide states with maximum flexibility in implementing water quality programs while preserving EPA’s core role in implementing federal Clean Water Act authorities and protecting interstate waters.

Objective 1.3 – Revitalized Land and Contamination Prevention

- NASDA encourages EPA to reestablish the interagency working group between EPA, FDA, USDA and SDAs on PFAS contamination. The working group met regularly to discuss and establish PFAS-related goals.

Objective 1.4 – Chemicals in the Environment

- NASDA shares EPA’s commitment to ensuring the safe use of chemicals and pesticides in the environment. In forty-three states and the territory of Puerto Rico, SDAs are the state lead agencies – the co-regulatory partners with EPA responsible for administering, implementing, and enforcing the production, labeling, distribution, sale, use, and disposal of pesticides under the Federal Insecticide, Fungicide, and Rodenticide Act.
- NASDA encourages EPA to maintain its commitment to a science- and risk-based pesticide regulatory framework under FIFRA. A predictable regulatory framework is critical for SLAs to conduct uniform, fair, and efficient enforcement activities.
- The Plan identifies “policy shifts which present potential challenges to meeting statutory timeframes.” NASDA recognizes the importance of responding to emerging policy

developments but urges EPA not to waver in its commitment to science- and risk-based determinations for pesticide regulations.

- NASDA appreciates EPA's commitment to meeting its Endangered Species Act obligations under FIFRA and encourages EPA to continue to positively iterate on the ESA Workplan in a manner that supports the enforceability of key mitigation measures.
- NASDA appreciates EPA's recognition of the importance of external communication and training with state partners in response to emerging issues. It is critical for EPA to prioritize this engagement with SLAs. SLAs often struggle to receive timely responses from EPA for inquiries related to regulatory interpretations or pesticide labeling questions. We recognize EPA's own resource constraints, but urge EPA to prioritize responsive and comprehensive communication with SLAs.
- As EPA continues to promulgate new requirements for ESA compliance, SLAs welcome all opportunities for additional training and guidance to carry out evolving co-regulatory responsibilities. The NASDA Foundation is undertaking ESA training and educational workshops through cooperative agreements with EPA and USDA's Office of Pest Management Policy, but SLAs will require EPA's continued participation and support to meet all future enforcement obligations.
- NASDA recognizes the opportunity for pesticide registration process improvements related to the use of artificial intelligence but encourages EPA to proceed in a manner that retains human oversight and allows for channels of communication through which errors or inconsistencies can be reported to EPA.

Objective 1.5 – Compliance and Enforcement

- As mentioned in Objective 1.4, EPA's science- and risk-based pesticide regulatory framework is the cornerstone of SLA's enforcement activities. NASDA appreciates EPA's prioritization of timely and efficient compliance and enforcement activities. As we will discuss in more detail in Objective 3.2, the most effective way to ensure co-regulatory efficiency and uniformity is through robust resources, training, and communication with state partners.

Goal 3: Advance Permitting Reform, Cooperative Federalism, and Cross-Agency Partnership

Objective 3.1 – Incentivized Investment

- NASDA appreciates EPA's recognition of the need to continue to improve bottlenecks in the pesticide registration process. Particularly, NASDA is encouraged by EPA's recognition of the importance of providing American farmers with access to new, innovative and safe tools to protect against crop loss and other pest impacts.

Objective 3.2 – Cooperative Federalism

- **General Co-Regulatory Priorities:**
 - NASDA supports the inclusion of Cooperative Federalism as a guiding pillar of the agency's strategic plan for the next four years. We share this priority with EPA and look forward to building on decades of successful co-regulatory partnerships.
 - As we look to enhance and deepen those co-regulatory relationships, NASDA encourages EPA to prioritize advanced communications with states, proactive collaboration, and a recognition of the states as equal partners. For example, SDAs benefit from earlier notification from EPA on planned visits to their respective states. All of these requests relate back to the importance of EPA incorporating states' inputs in its regulatory determinations.

- NASDA encourages EPA to continue seeking opportunities SDAs to participate in advisory committees such as the Farm, Ranch, and Rural Communities Committee and Local Government Advisory Committee. These FACAs are critical interfaces between EPA and its stakeholders, including state government.
- Pesticide Co-Regulatory Priorities
 - Within the pillar of Cooperative Federalism, NASDA encourages EPA to explicitly emphasize the importance of pesticide co-regulation with states. State co-regulation of pesticides is enshrined in FIFRA and represents one of the most important shared responsibilities between states and EPA. NASDA shares EPA’s goals of improving public confidence in pesticide regulations, as noted in the final *Make Our Children Healthy Again* Strategy Report¹. We believe EPA’s full support for states’ enforcement of pesticide regulations must be part of that effort. Explicit recognition in this strategic plan of the importance of this co-regulatory relationship would help bolster SLAs’ confidence in the stability of key resources, training programs, and communication channels moving forward.
 - EPA’s support through State & Tribal Assistance Grants is critical to ensuring these co-regulatory programs are implemented in a uniform and efficient manner. Additionally, federal support can provide SLAs with the federal legal authority to conduct certain enforcement activities, such as production site inspections, that may otherwise not be uniformly available in all states. Thus, robust EPA support for co-regulation is vital for efficient, consistent enforcement activities.
 - Furthermore, SLAs regularly conduct human health and environmental safety programs, such as unusable pesticide product disposal initiatives, that receive limited to no support from EPA. NASDA encourages EPA to recognize and improve support for these shared pesticide safety priorities.
 - NASDA urges EPA to continue coordination with key co-regulatory bodies in addition to NASDA. The Association of American Pesticide Control Officials and the State FIFRA Issues Research & Evaluation Group are indispensable forums for discussion between SLAs and EPA. EPA’s continued participation in those forums is vital to a functioning pesticide co-regulatory framework.
 - In addition to improved communication, EPA’s support for training programs such as, but not limited to, Pesticide Inspector Residential Training and Pesticide Regulatory Education Program is paramount. It is important for EPA to support training programs - both through resources and in-person attendance from key staff across the organization, including the Office of Pesticide Programs and the Office of Enforcement and Compliance Assurance. While NASDA understands EPA’s interest in improving technology solutions for compliance assistance and training, we urge the agency to prioritize in-person attendance and human participation whenever possible. The importance of maintaining collaborative relationships between EPA and SLAs cannot be overstated.
 - NASDA encourages EPA to support SLAs when they undertake enforcement actions by providing them with the necessary resources, clarity, and – critically – by standing by the agency’s own regulatory findings throughout the enforcement process.

¹ <https://www.whitehouse.gov/wp-content/uploads/2025/09/The-MAHA-Strategy-WH.pdf>

Objective 3.3 – Organizational Excellence

- States have enjoyed a robust and sound process for the management of EPA grants and cooperative agreements. While many federal agencies' processes break down during a government shutdown, EPA's digital grants management processes remain operational, ensuring core regulatory functions are funded during periods that place significant strain on SLAs. We encourage EPA to continue prioritizing the current payment system and to reimburse SLAs for their work in a timely manner.