



Ms. Anne Idsal, Acting Assistant
Administrator for Air and Radiation
U.S. Environmental Protection Agency
Mail code: 6101A
1200 Pennsylvania Ave, N.W.
Washington, DC. 20460

December 19, 2019

Dear Acting Assistant Administrator Idsal:

The Western States Air Resources (WESTAR) Council is an association of 15 western state air quality agencies. The WESTAR member states value the partnership with EPA and view their role as co-regulators with respect to implementation of Clean Air Act (CAA) requirements. We are writing today in the spirit of cooperative federalism to express the imperative for the federal government to consult with western state air quality agencies given the impact of federal regulatory actions that have far reaching effects on the ability of state air quality agencies to successfully manage air pollution within their states.

Changes to federal requirements may have profound effects on the ability of states to achieve the National Ambient Air Quality Standards (NAAQS) if areas are in non-attainment or to maintain air quality in areas that are in compliance with the NAAQS. In the absence of appropriate and effective federal pollution controls, states must find other emissions reductions in nonattainment areas, which may not be as effective or efficient as federal regulations for attaining and maintaining the NAAQS. This substantially shifts the burden of work in non-attainment areas to states, disrupting the balance of responsibility and creating increased resource needs at the state level. However, states should not be precluded to go beyond the minimum federal requirements if they are willing to expend state resources when their specific needs dictate it is warranted. The shared responsibility for clean air between states and the federal government has been an integral part of the success of the CAA over the past several decades in reducing emissions and improving air quality while the United States has achieved significant economic growth.

In consideration of the shared implementation responsibility for clean air in the western U.S., states and the federal government have a shared responsibility to collaborate more

effectively to ensure that the federal government considers the implications for state air resource management in its rulemaking decisions. This requires that the federal government conduct a comprehensive assessment of the impact of promulgating and changing regulations and the burden it places on state air quality agencies and their ability to protect the public from the adverse consequences of air pollution.

We urge you to provide meaningful opportunities to consult with and actively solicit input on regulatory developments from western state air quality agency partners and invite you and your leadership team to more actively engage with states for the common good of air quality in the western U.S. We refer you to the Western Governors' Association Policy Statements and their recent letter to Administrator Wheeler for specific suggestions on how to improve the federal-state relationship to produce effective regulations and cleaner air.

Sincerely,



Mary Uhl, Executive Director
WESTAR

Attachments

Western Governors' Association [Policy Resolution 2017-01](#)

Western Governors' Association [Policy Resolution 2018-05](#)

Western Governors' Association [letter](#) to EPA Administrator Wheeler, March 25, 2019