



Environmental Council of the States

1250 H Street NW, Suite 850 | Washington, DC 20005
(202) 266-4920 | www.ecos.org

Administrator Andrew R. Wheeler
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

Sent via email to wheeler.andrew@epa.gov

September 26, 2019

Administrator Wheeler,

Today at the ECOS 2019 Fall Meeting in Seattle, Washington, the membership approved the following statement:

Constructive, collaborative, and respectful engagement between state and federal governments is an essential element in the protection of our nation's public health and environment. ECOS, as the nonprofit, nonpartisan association of state and territorial environmental agency leaders, is concerned that recent communications and actions by U.S. EPA are damaging this engagement and eroding our ability to jointly protect our citizens and the environment.

ECOS is seriously concerned about a number of unilateral actions by U.S. EPA that run counter to the spirit of cooperative federalism and to the appropriate relationship between the federal government and the states who are delegated the authority to implement federal environmental statutes.

Recent letters to states and Federal Register notices that lacked discussion with and notification to states violate the principles of Cooperative Federalism 2.0.

We are concerned about the lack of advance consultation with states and the impact of these and several other actions on the ability of states to protect human health and the environment, and call on U.S. EPA to return to the appropriate relationship with the states as coregulators under our nation's environmental protection system.

We respectfully demand that the U.S. EPA Administrator and senior leadership immediately meet with the ECOS leadership team to discuss these concerns.

Sincerely,

Donald S. Welsh

202-266-4920
dwelsh@ecos.org

CC: ECOS Officers

Jim Macy

Nebraska Department of
Environment and Energy
ECOS President

Patrick McDonnell

Pennsylvania Department of
Environmental Protection
ECOS Vice President

Ben Grumbles

Maryland Department of the
Environment
ECOS Secretary-Treasurer

Becky Keogh

Arkansas Department of Energy and
Environment
ECOS Past President

Donald Welsh

ECOS Executive Director