



Toi Hutchinson
State Senator
Illinois
President, NCSL

Jon Heining
General Counsel
Legislative Council
Texas
Staff Chair, NCSL

William Pound
Executive Director

Sept. 19, 2018

Acting Administrator Andrew Wheeler
Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20460

Dear Acting Administrator Wheeler:

The National Conference of State Legislatures (NCSL), the bipartisan organization representing the legislatures of our nation's states, territories, and commonwealths, recently held its 2018 Legislative Summit. After significant discussion and debate, the full conference readopted several policy positions concerning the relationship between states and the Environmental Protection Agency (EPA). A summary and link to those positions are provided below.

Climate Change Policy Resolution

NCSL encourages EPA to ensure that any potential actions to address greenhouse gas emissions provide states with flexibility to implement actions in the most cost effective, timely, and efficient manner for each state. Actions should not pre-empt states or localities from implementing more stringent measures within their respective jurisdictions. Furthermore, NCSL strongly urges expanded research, development, and the deployment of new and existing technologies to reduce greenhouse gas emissions. This includes the promotion of policies and procedures to increase natural carbon sequestration of CO₂ that include sustainable timber harvesting, control burns, reseeding and rehabilitation of natural and introduced grassland plants. Additionally, NCSL requests that state elected officials, their national representative organizations and existing interstate partnerships are consulted regularly on any potential formal actions.

National Agriculture Policy Directive, Pollinator Health

The negative ramifications of pollinator loss are well documented and pose a significant threat to U.S. agriculture and the ability of our farmers to feed a growing world population. Pollinators are vital organisms in the ecosystem, providing biodiversity, and ensuring agriculture economies continue to thrive. NCSL urges the federal government, as landowner and manager, regulator of pesticide products, and financial assistance provider to farmers and other private landowners, to develop best management practices that enhance pollinator habitats. Additionally, the federal government should provide technical assistance in identifying and implementing projects to conserve pollinators and assess the effects of systemic pesticides and parasites on pollinator health and take action, as appropriate, to protect pollinators.

In addition to the issues mentioned above, NCSL has a number of other existing policy positions that fall under the purview of EPA, including:

Air Policy Directive—NCSL urges EPA to fulfill its responsibilities to facilitate implementation of the Clean Air Act and urges the agency to reform the new source review program to achieve improvements that enhance the environment and increase production capacity.

Environmental Federalism—NCSL urges the federal government to renew its commitment to the state-federal partnership of environmental protection and urge the federal government not abandon its commitment to uniform minimum federal standards.

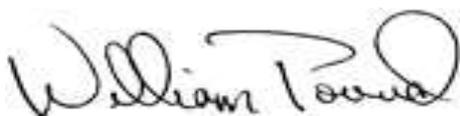
Federal Chemical Policy—NCSL urges the agency to implement the Frank R. Lautenberg Chemical Safety for the 21st Century Act as instructed by the statutory deadlines, and continue to interact regularly with states as it continues to build and deliver a strong national chemical regulatory system.

Waste Management—NCSL outlines the conference's principles surrounding waste management programs and policies to minimize the present and future threat to human health and the environment.

Water Policy—NCSL supports more coordinated and consistent federal policies that recognize and build upon the constitutions, statutes, policies and programs of the states as the fundamental basis for a truly national effort toward better water resources management.

For more information or if you have any follow up questions, please contact NCSL staff Ben Husch (ben.husch@ncsl.org) and Kristen Hildreth (kristen.hildreth@ncsl.org). We welcome the opportunity to work with EPA on areas of shared interest for both the states and the federal government.

Sincerely,



William T. Pound
Executive Director
National Conference of State Legislatures

Enclosures (2)

[Climate Change Policy Resolution](#)
[National Agriculture Policy Directive, Lines 132-169](#)