

POST

Comment Filed on Trump Executive Order to Reduce Regulations that Includes Plan for Simplifying the Air Quality Management System

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A public comment was filed on Executive Order E.O. 13771 that includes a plan for simplifying the air quality management system at its foundation: (see below or <https://www.regulations.gov/document?D=EPA-HQ-OA-2017-0190-0226> (<https://www.regulations.gov/document?D=EPA-HQ-OA-2017-0190-0226>)).

Time to simplify the nation's air quality management system to better prepare ourselves for the problems and opportunities of a 21st century world. We can make it happen.



You are commenting on:

The *Environmental Protection Agency* (EPA) Other: [Memo opening a comment period for this docket.](https://www.regulations.gov/document?D=EPA-HQ-OA-2017-0190-001) (<https://www.regulations.gov/document?D=EPA-HQ-OA-2017-0190-001>)

This is how your comment will appear on Regulations.gov:

Comment: My name is Jed Anderson. I am an environmental attorney with the AL Law Group and former attorney with Baker Botts and Vinson & Elkins, and an Adjunct Professor of Law at the University of Houston Law School where I taught the Clean Air Act.

I appreciate the opportunity to provide the following comment and proposal.

Instead of working through each rule individually to simplify the regulatory system—a much easier, quicker, and simpler way to achieve the goals of E.O. 13771 is to work the problem backwards starting with a simple solution. As John Gall said, “A complex system that works is invariably found to have evolved from a simple system that worked. A complex system designed from scratch never works and cannot be patched up to make it work. You have to start over, beginning with a working simple system.”

To this end, attached is a proposal that reduces regulations by approximately 75% while improving air quality. The proposal could be accomplished via reforms to the Clean Air Act or potentially by consolidating statutory programs via a regulation or Executive Order that creates an alternative means of compliance approach consolidating compliance with the programs. Attached is a proposal that was submitted to the Texas Commission on Environmental Quality yesterday that includes this simplification approach via consolidation. Attached also is a summary along with draft legislative text that implements the regulatory reduction approach via statute.

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Uploaded File(s)(Optional)

- Clean Air Act Reauthorization of 2017.pdf

- [The Clean Air Act Reauthorization of 2017.pdf](#)
 - [Petition for Rulemaking to Reduce Rulemaking.pdf](#)
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Original source: <https://sipreform.wordpress.com/2017/04/12/first-public-comment-filed-on-trump-executive-order-to-reduce-regulations/> (April 11, 2017)

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