



Burning Down the EPA

Documenting the
Second Trump Administration's
Historic Assault



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September 3, 2025

Chris Sellers, Scout Blum, Ellen Kohl, Marianne Sullivan,
Leif Fredrickson, Shannan Lenke Stoll, Michael Legefelf, Kim Barrett, Anna Levy, and EDGI

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Table of Contents

List of Figures	2
Executive Summary	3
Introduction: Lee Zeldin and His Precursors	4
How Did We Get Here?	11
Undermining the EPA's Mission	13
Fire-setting on Many Fronts	17
Deregulating	17
Defunding	23
Downsizing	26
Sidelining Science	32
Tying the Hands of EPA Staff	37
Conclusion: The EPA's FY26 Budget Proposal in Context	40
Appendix A: Regulatory Reconsiderations Announced	43
Appendix B: Congressionally Appropriated Funding Cancelled or Frozen by EPA	50

List of Figures

Figure 1. Budget Cuts as Strategy for Administrative Assault on the EPA	8
Figure 2. Staff Cuts as Strategy for Administrative Assault on the EPA	9
Figure 3. EPA State and Tribal Assistant Grants, 2006-2025	16
Figure 4. Trends in Overall EPA Workforce since 1998	28
Figure 5. Zeldin's Downsizing versus Gorsuch's	30
Figure 6. EPA Staffing During the Reagan Presidency	31
Figure 7. Proposed and Actual Budgets for Science and Technology in the EPA	35
Figure 8. Proposed and Actual Staffing for Science and Technology in the EPA	36
Figure 9. A Historic Low: Zeldin EPA's Rules Submitted to OIRA for Review	39
Figure 10. Another Historic Low: EPA's Rules Proposed or Announced in <i>Federal Register</i>	40

Executive Summary

Under Administrator Zeldin, the EPA has begun incinerating many of the environmental and health protections this agency has provided for decades. Since January 2025, the Zeldin-led EPA has:

- pledged to unshackle industries from environmental rules and oversight while lowering costs for polluters;
- proposed a 54.4% cut in EPA's budget for fiscal year 2026 that surpasses the high-water mark set by the first Trump administration as the most ambitious cut ever proposed for this agency by the Executive Branch; and
- pre-emptively made drastic cuts without consulting Congress.

Building and expanding upon tactics of earlier EPA-hostile Administrations, the Zeldin-led EPA has launched the most damaging assault in the agency's 54-year history. These tactics can be broken down into the following methods employed under Zeldin's leadership:

Deregulating

Zeldin's announcements of historic deregulation include a reconsideration of the endangerment finding, with potentially far-reaching consequences if successful. Yet, this deregulatory agenda has been bogged down, likely by internal damage inflicted on the EPA, and Zeldin-led EPA's track record on rule proposals and finalizations is actually the lowest on record for the first six months of a new administration.

Defunding

In addition to its draconian budget proposal for FY26, the Zeldin-led EPA backed by DOGE and OMB froze or cancelled:

- over \$25 billion that Congress appropriated to the agency, most of it through the Inflation Reduction Act; and
- contracts and grant programs in Environmental Justice, DEI, and climate change paid for through EPA's own Congressionally approved budget appropriations.

Downsizing

Zeldin's office along with DOGE has cut EPA staff by thousands, to at or below its lowest point of the 1980s, without Congressional approval. EDGI estimates the **total number of**

EPA staff reductions by the end of the fiscal year to be between 25-33% of its total staff, which is between twice and three times as much as what the agency proposed to Congress for fiscal year 2026. The only historical precedent for such a cut in EPA's staff was the 17% reduction that took place over two years in the early 1980s, an act that culminated in President Reagan's firing of Anne Gorsuch followed by six years of growth in EPA staff and budgets under Reagan.

Sidelining Science

[EPA's press office has announced](#) the breakup of the agency's Office of Research and Development. [Internal documents suggest](#) this will involve firing two thirds of ORD's 1500 employees.

Tying the Hands of Staff

EPA staff describe a workplace riddled with diminished teams and "intentional inefficiencies" that have brought much of the agency's work to a standstill, exacerbated by "malignant neglect" of career-staff leadership by political appointees.

Among the probable early impacts of stymied staff:

- EPA's regulatory plans for Spring 2025 are not yet published on the OIRA website and
- EPA has hit historic lows in: 1) the number of rules sent to the OMB for review, and 2) proposed and finalized rules published in the *Federal Register*.

Introduction: Lee Zeldin and His Precursors

Since being sworn in as EPA administrator in late January, Trump appointee Lee Zeldin has struck matches along the hallways of an agency that is Americans' foremost protector of environmental health, shielding against the pollution of land, air, and water. He's redefined the agency's mission of "protecting human health and the environment" to encompass tamping down on "extreme climate alarmism," "lowering [the] cost of living," and

unshackling industries from environmental obligations.¹ Though Zeldin and his press office have sought to distract and deny, the new EPA leadership has signaled its intentions with its proposal for a record-breaking 54.4% cut in EPA's appropriations in the coming fiscal year. This never-before attempted halving of the agency's resources would incinerate many of the environmental and health protections the EPA has provided for decades.²

The budget is currently in the hands of Congress who must make its decision on appropriations by September 30, when EPA's funding runs out and a federal government shutdown looms. Yet while the House and Senate deliberate, many of the cuts proposed by EPA's new leadership for the next fiscal year have already been made. The administration has moved ahead with staff and funding cuts and is initiating aggressive interventions to impede or undermine much of the agency's day-to-day operations. Without electoral mandate or Congressional approval, the second Trump administration (hereafter, Trump II) is immolating America's leading environmental agency.

The Zeldin-led EPA joins the historical ranks of [three predecessor administrations](#) that have aggressively assaulted the EPA's protective mission.³ Anne Gorsuch, a corporate lawyer turned anti-environmental legislator, became the Reagan administration's first EPA head in 1981. Her proposed 17% reduction in EPA operating funds did not go as far as Zeldin's proposed 54.5 % cuts and countered an initial 36% cut proposal from the Office of

¹ Lee Zeldin, "Trump's EPA Is Powering Environmental Protection and Economic Growth," *The Hill*, 2025, <https://thehill.com/opinion/energy-environment/5275847-trump-epa-environmental-stewardship/> ("extreme"); Office of the Administrator, "What They Are Saying: Leaders Recognize EPA's 100 Monumental Actions in First 100 Days of Trump Administration," News Release, *U.S. Environmental Protection Agency Website*, May 2, 2025, <https://www.epa.gov/newsreleases/what-they-are-saying-leaders-recognize-epas-100-monumental-actions-first-100-days> ("lowering").

² Also on the FY26 EPA budget proposal, see Janet McCabe and Stan Meiburg, "What Trump's Budget Proposal Says about His Environmental Values," *The Conversation*, June 27, 2025, <http://theconversation.com/what-trumps-budget-proposal-says-about-his-environmental-values-258962>; "Facts: Trump FY26 EPA Skinny Budget Factsheet," *Environmental Protection Network*, 2025, <https://www.environmentalprotectionnetwork.org/epafacts/fy26-budget-factsheet/>.

³ Leif Fredrickson et al., "History of US Presidential Assaults on Modern Environmental Health Protection," *American Journal of Public Health* 108, no. Suppl 2 (2018): S95–103, <https://doi.org/10.2105/AJPH.2018.304396>; Richard N. L. Andrews, *Managing the Environment, Managing Ourselves: A History of American Environmental Policy* (Yale University Press, 2020).

Management and Budget (OMB; see introduction).⁴ During her short tenure, she tore into the agency's regulatory work, attacking EPA's rules and the reach of its protections—most spectacularly, by breaking up the enforcement office, cutting staff, and trying to curb EPA's scientific research. That assault backfired functionally as well as politically. By March of 1983 Gorsuch was gone, replaced by a returning William Ruckelshaus, EPA's first administrator, who vowed to “stabilize the EPA...to re-instill in the people there the dedication to their task [and] to get on with this enormously complicated job of cleaning up our air and water and protecting our citizens against toxic substances.”⁵

Years later, the G.W. Bush administration's first administrator (2001-2003) Christine Todd Whitman inaugurated what became another concerted effort to deregulate. Compared to Gorsuch, Whitman proved “less overtly confrontational but also more sophisticated.”⁶ Whitman's approach relied less on cutting budgets and staff, more on “delaying decisions” such as standards for arsenic in drinking water and mercury emissions from power plants. The Whitman-led EPA also focused on “undermining science,” especially on climate change, by scrubbing or tempering agency websites, and pressuring employees not to discuss or mention climate change or its link to the burning of fossil fuels.

The closest counterpart to what we are now seeing, however, came in the first Trump administration (hereafter, Trump I), whose first EPA administrator Scott Pruitt (2017-2019) revived Gorsuch's confrontational tactics. Along with his successor Andrew Wheeler, Pruitt repeatedly set new records for proposed cuts to EPA's budget while actively chipping away at its staff, [rolling back over 100 major environmental rules](#), marginalizing the influence of science and agency scientists on decision-making, scrubbing climate and other environmental science and information from websites, and torpedoing this agency's enforcement of the nation's environmental laws.⁷ Pruitt and Wheeler together set a new

⁴ Congressional Budget Office, *The Environmental Protection Agency: Preliminary Analysis of the Proposed 1983 Budget*, Staff Working Paper (Congressional Budget Office, 1982), 2, https://www.cbo.gov/sites/default/files/97th-congress-1981-1982/reports/doc05-entire_3.pdf.

⁵ Ronald Reagan and William D. Ruckelshaus, “Remarks and a Question-and-Answer Session With Reporters on the Nomination of William D. Ruckelshaus To Be Administrator of the Environmental Protection Agency,” Ronald Reagan Presidential Library Website, March 21, 1983, <https://www.reaganlibrary.gov/archives/speech/remarks-and-question-and-answer-session-reporter-s-nomination-william-d-ruckelshaus>.

⁶ Leif Fredrickson et al., “History of US Presidential Assaults,” 98, <https://doi.org/10.2105/AJPH.2018.304396>.

⁷ Lindsey Dillon et al., “Environmental Data Justice and the Trump Administration: Reflections from the Environmental Data and Governance Initiative,” *Environmental Justice* 10, no. 6 (2017): 186–92, <https://doi.org/10.1089/env.2017.0020>; Chris Sellers et al, “An Embattled Landscape, Part 2b: The

high watermark for how much political appointees to the EPA could undermine this agency's ability to protect people and their environments.

The Zeldin-led EPA has used five strategies, drawn heavily from these predecessors but intensified, to stifle the agency:

1. **Deregulating:** The reconsideration of rules ratified to implement environmental laws was a priority of Zeldin's de-regulatory predecessors, and Zeldin's press office has followed suit by boasting its own historic deregulatory efforts. Yet whereas six months into Pruitt's leadership under Trump I, EPA had announced 200 "proposed rules" and 253 finalized rules in the *Federal Register*, in the first six months of Zeldin's leadership under Trump II only three EPA rules had been proposed, and none finalized, in the *Federal Register* (Figure 10). By August 25, some 111 additional rule proposals and 114 final rules suddenly appeared in the *Federal Register*, almost all post-dated to the six months before they were formally published. Despite this, the EPA under Zeldin has hit **historic lows in this and other public benchmarks of regulatory activity**. The main initiative supporting the agency's public claims about "historic" deregulation is a [proposed revocation of EPA's 2009 endangerment finding](#), which provides the basis for EPA to regulate greenhouse gases under the Clean Air Act.⁸ If successful, this move would indeed be a historic deregulatory effort that would incinerate over a decade of EPA efforts to curb emissions that cause climate change.
2. **Defunding:** This strategy was used by Gorsuch during the Reagan administration, abandoned in 1983 following the political blowback against her attacks on the EPA, and

Declining Capacity of Federal Environmental Science," *Environmental Data and Governance Initiative*, May 4, 2020, <https://envirodatagov.org/embattled-landscape-series-part-2b-the-declining-capacity-of-federal-environmental-science/>; Leif Frederickson et al, *A Sheep in the Closet: The Erosion of Enforcement at the EPA* (Environmental Data and Governance Initiative, 2019), <https://envirodatagov.org/publication/a-sheep-in-the-closet-the-erosion-of-enforcement-at-the-epa/>; EDGI Comms, "How Information Was Suppressed in Trump's First 100 Days (and How It Compares to Last Time)," *Environmental Data and Governance Initiative*, April 29, 2025, <https://envirodatagov.org/how-information-was-suppressed-in-trumps-first-100-days/>.

⁸ Maxine Joselow and Lisa Friedman, "In Game-Changing Climate Rollback, E.P.A. Aims to Kill a Bedrock Scientific Finding," *Climate, The New York Times*, July 29, 2025, <https://www.nytimes.com/2025/07/29/climate/epa-endangerment-finding-repeal-proposal.html>; Patrick Parenteau, "Revoking EPA's Endangerment Finding – the Keystone of US Climate Policies – Won't Be Simple and Could Have Unintended Consequences," *The Conversation*, March 19, 2025, <http://theconversation.com/revoking-epas-endangerment-finding-the-keystone-of-us-climate-policies-wont-be-simple-and-could-have-unintended-consequences-252271>.

revived under Trump I. Zeldin has taken this strategy much further under Trump II, with his **FY2026 proposed budget cut far surpassing any previous administration's**. Moreover, aided by the Department of Government Efficiency (DOGE), Zeldin's leadership of EPA has enacted many of these cuts without Congressional approval, internally freezing or cutting spending appropriated by Congress, challenging Congress' constitutional spending authority in the process.⁹¹⁰

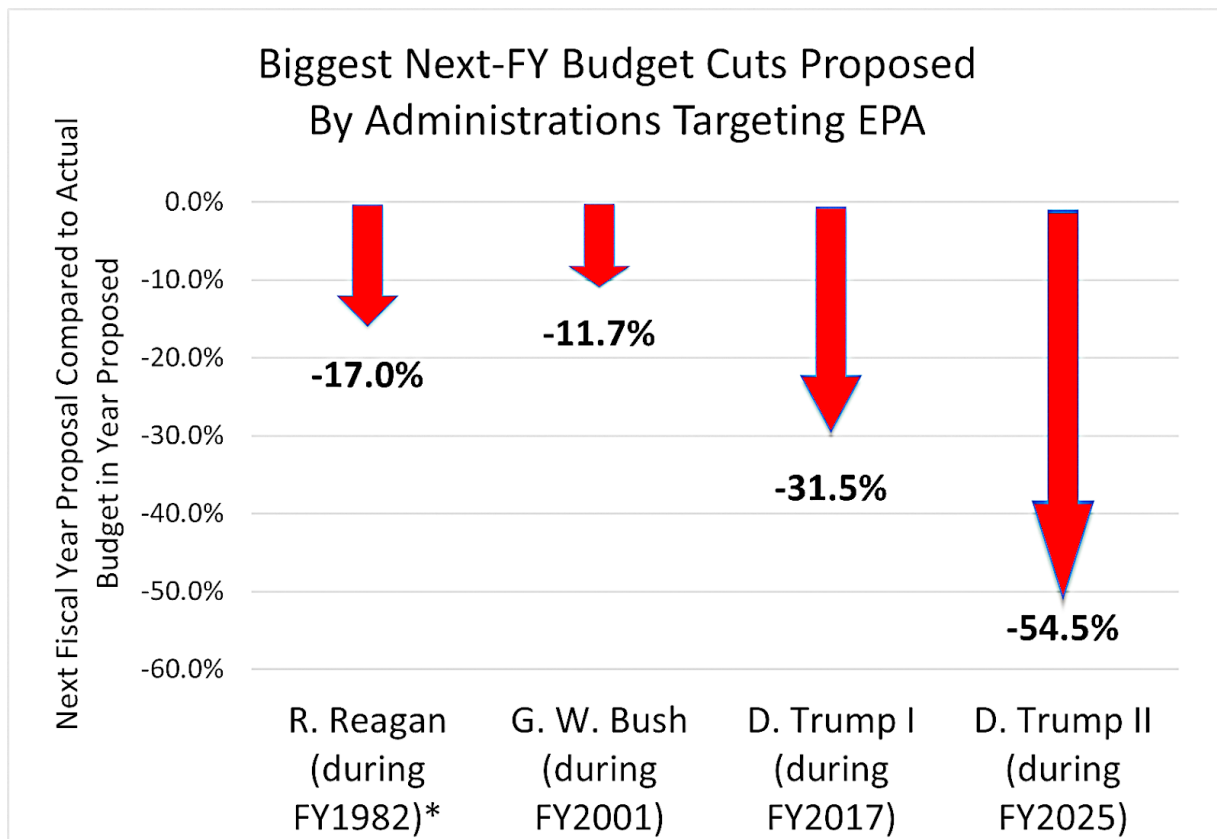


Figure 1. Budget Cuts as Strategy for Administrative Assault on the EPA. The current administration now holds the record for the biggest proposed reduction in this agency's funding (*= operating budget, not counting special appropriations for a newly authorized Superfund). Methodological note: In this and subsequent figures, we use "actual" rather than "enacted" budget figures for comparison, since these presumably capture actual expenditures by the agency in a given year. Since the "actual" figures only become available the following fiscal year, we use the "enacted" figure for FY25. To adjust for inflation, we use deflator calculations [provided by the Federal Reserve Bank of St. Louis](#). Sources: EPA Congressional Budget Justifications for FY2002, FY2018, and FY2026; CBO, *The Environmental Protection Agency: Preliminary Analysis of the Proposed 1983 Budget*; [link to data](#).

⁹ Kate Stith, "Common Interpretation: Appropriations Clause," The Interactive Constitution; National Constitution Center, 2015, <https://constitutioncenter.org/the-constitution/articles/article-i/clauses/756>.

¹⁰ US Constitution Article I, Section 9, Clause 7.

3. **Downsizing:** Also abandoned after Gorsuch's departure, downsizing regained traction in the early 2010s when the Republican-led 112th Congress enacted EPA staff reductions during the Obama administration. Trump I advanced this strategy through retirement incentives and staffing cuts proposed to Congress, bringing the size of the agency down to where it stood in the last year of the Reagan administration. Zeldin's office and DOGE have already **cut EPA staff by thousands more, to at or below its lowest point** during the 1980s, without Congressional approval.

Using retirement incentives and large reductions in force, by the end of September 2025 Zeldin's office will have **cut staff more than twice as much**, and perhaps three times as much, **as what it proposed for its FY2026 appropriations** now before Congress.

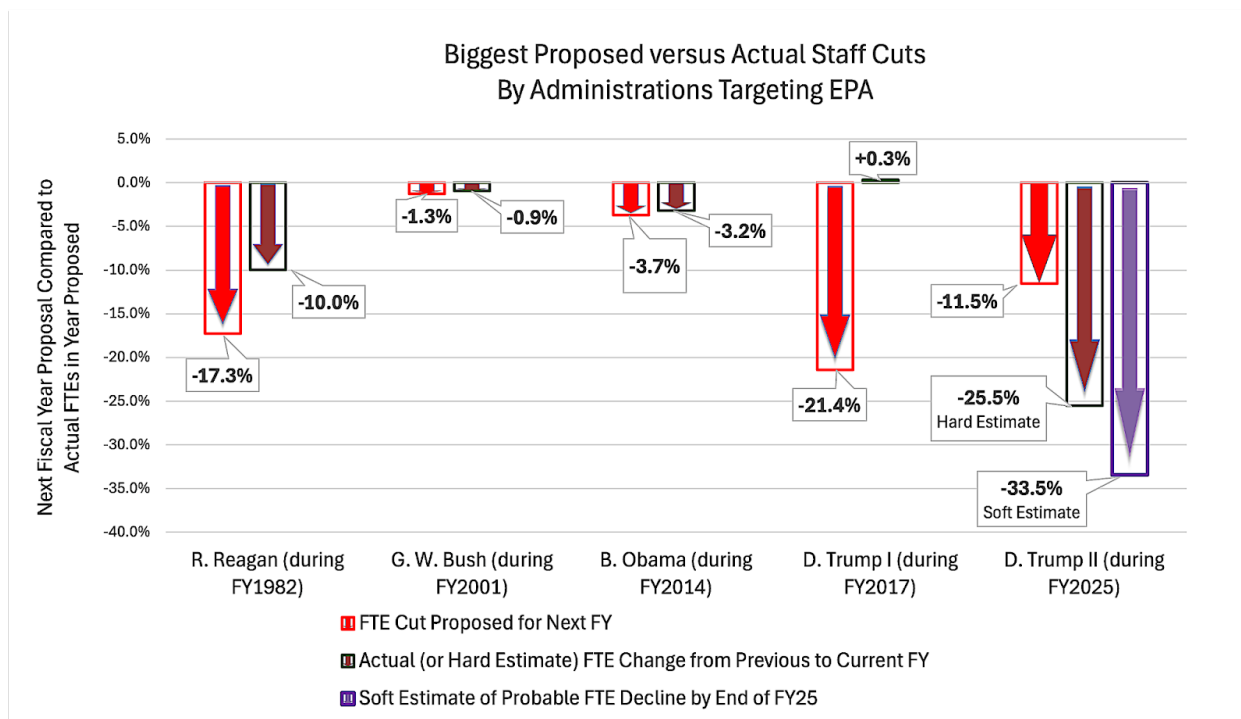


Figure 2. Staff Cuts as Strategy for Administrative Assault on the EPA. The current administration now holds the record for the biggest actual reduction in agency staff reported over its first six months. Our hard estimate of a 25.5% actual reduction by September 30 (end of the 2025 fiscal year) comes from subtracting the current departure numbers in EPA's July 18 press release (though not in Full-time Equivalents or FTEs) from the 2024 actual staffing level (in FTEs) reported to Congress in EPA's FY26 Budget Justification (see Figure 4 and associated text for the assumptions and rationale behind these estimates). The soft estimate of a 33.5% cut adds the maximum cut of ORD staff currently under discussion—while not including figures from the third round of deferred resignations, which are not yet available. Methodological note: In this and subsequent figures, we have used "actual" rather than "enacted" FTE figures for comparison, since these presumably capture actual staffing the agency in a given year. Sources: EPA Congressional Budget Justifications for FY2002,

FY2018, and FY2026; CBO, The Environmental Protection Agency: Preliminary Analysis of the Proposed 1983 Budget; EPA Press Release, July 18, 2025; [link to data](#).

4. **Sidelining Science:** While early Reagan administrators sought to cut research budgets and stack advisory committees with political appointees, from the G.W. Bush administration onward, anti-environmental administrations have increasingly targeted EPA science and curbed its use in policy-making. Though most of Zeldin EPA's science-undermining tactics follow those of Trump I, its **elimination of the agency's Office of Research and Development** without Congressional consultation, and in the face of bipartisan Senatorial protest, goes further.¹¹
5. **Tying the Hands of Staff:** The historical record of the first Reagan EPA is similar to what EDGI interviewees report about the second Trump EPA: a "hit list" of targeted employees, "a paranoia that virtually brought [work] to a standstill," and the mass departure of staff.¹² Similarly during the early months of Trump I, an EDGI report found employees "caught in the crosshairs of initiatives aimed at their work and job security yet also paralyzed by [a] paucity of direction."¹³ During Zeldin's first half-year, EPA staff describe a **workplace riddled with "intentional inefficiencies" and "malignant neglect."** Among the likely consequences of this disarray, the Zeldin-led EPA has **yet to publish its regulatory plans** for Spring 2025 on the OIRA website. It has also hit **historic lows in the number of rules sent to the OMB** for review as well as proposed and finalized rules published in the *Federal Register*.

The second Trump administration appears on track to cause greater damage than any of its predecessors to the EPA and its essential mission.

¹¹ Lisa Friedman, "Trump Administration Aims to Eliminate E.P.A.'s Scientific Research Arm," *Climate, The New York Times*, March 18, 2025, <https://www.nytimes.com/2025/03/17/climate/trump-eliminates-epa-science.html>; Marianne Lavelle, "Dismantling of EPA's Scientific Research Arm Fulfills Key Chemical Industry Goal," *Inside Climate News*, July 21, 2025, <https://insideclimatenews.org/news/21072025/trump-administration-dismantles-epa-office-of-research-and-development/>.

¹² B. Dan Wood, "Principals, Bureaucrats, and Responsiveness in Clean Air Enforcements," *The American Political Science Review* 82, no. 1 (1988): 217 ("hit"); 218 ("paranoia"), <https://doi.org/10.2307/1958066>.

¹³ Christopher Sellers et al and Environmental Data and Governance (EDGI), *EPA under Siege; Trump's Assault in History and Testimony*, 100 Days and Counting (Environmental Data and Governance Initiative, 2017), 52 (quotes), <https://envirodatagov.org/publication/the-epa-under-siege/>.

How Did We Get Here?

In the early 1980s, when the EPA was just over ten years old and the House of Representatives retained a Democratic majority, Gorsuch's assault on the EPA generated such an outcry that President Reagan reversed course. From 1983 onward, the agency made steady gains in funding and staff. Over the past decade, however, Trump-era EPA leaders have had a comparatively freer hand to attack the agency without congressional pushback.

Over the past three decades, deep-seated political and social shifts have set the stage for Zeldin's current intensification of attacks on the EPA. Among these, [party politics have become more polarized](#) and [environmental protection more partisan](#) since the 1990s. Republicans on the whole have [shifted rightward](#) to increasingly elect politicians who campaign and vote against environmental protections, while Democrats now more uniformly favor them.¹⁴ This has been coupled with a surge in [corporate funding of anti-environmental politicians and their parties](#).¹⁵ The fossil fuel industry, in particular, has spent [lavishly](#)—several [hundred million dollars](#)—to elect the Trump administration and the current Congress.¹⁶ Meanwhile, news media have become polarized [echo chambers](#)¹⁷, and

¹⁴Jill Kimball, "U.S. Is Polarizing Faster than Other Democracies, Study Finds," News from Brown; Brown University Website, January 21, 2020, <https://www.brown.edu/news/2020-01-21/polarization>; Aaron M. McCright et al., "Political Polarization on Support for Government Spending on Environmental Protection in the USA, 1974–2012," *Social Science Research* 48 (November 2014): 251–60, <https://doi.org/10.1016/j.ssresearch.2014.06.008>; Drew DeSilver, "The Polarization in Today's Congress Has Roots That Go Back Decades," *Pew Research Center*, March 10, 2022, <https://www.pewresearch.org/short-reads/2022/03/10/the-polarization-in-todays-congress-has-roots-that-go-back-decades/>.

¹⁵ Theda Skocpol and Alexander Hertel-Fernandez, "The Koch Network and Republican Party Extremism," *Perspectives on Politics* 14, no. 3 (2016): 681–99, <https://doi.org/10.1017/S1537592716001122>.

¹⁶ Dharna Noor, "Big Oil Spent \$445m in Last Election Cycle to Influence Trump and Congress, Report Says," US News, *The Guardian*, January 23, 2025, <https://www.theguardian.com/us-news/2025/jan/23/big-oil-445m-trump-congress>; Karin Kirk, "The Fossil Fuel Industry Spent \$219 Million to Elect the New U.S. Government » Yale Climate Connections," *Yale Climate Connections*, January 3, 2025, <https://yaleclimateconnections.org/2025/01/the-fossil-fuel-industry-spent-219-million-to-elect-the-new-u-s-government/>.

¹⁷ Swathi Meenakshi Sadagopan, "Feedback Loops and Echo Chambers: How Algorithms Amplify Viewpoints," *The Conversation*, February 4, 2019, <http://theconversation.com/feedback-loops-and-echo-chambers-how-algorithms-amplify-viewpoints-107935>; Morgan Kelly, "Political Polarization and Its Echo Chambers: Surprising New, Cross-Disciplinary Perspectives from Princeton," *Princeton University News*, December 9, 2021,

trust in science has eroded. While through the 1980s polls showed more trust in science among Republicans than among Democrats, [after 2000 Republicans turned more distrustful](#), and since the COVID-19 pandemic this trust has taken a nosedive.¹⁸

This growing polarization has played out in the U.S. Congress as well, through frequent [gridlock](#).¹⁹ The yearly Congressional appropriations process now routinely deadlocks, culminating in shutdown threats and shorter-term [Continuing Resolutions](#) that fail to incorporate administration requests.²⁰ Recent turns in the conservative movement itself have also been influential, with [traditional Republican principles of limited government giving way to favor unchecked power for the president](#), a shift bolstered by [recent decisions](#) of the Supreme Court's conservative majority.²¹ This context laid the way for a dramatic intensification of assaults on the EPA under Zeldin, as this report will show.

Zeldin's leadership is largely fulfilling the blueprint laid out in [Project 2025](#), the well-funded Heritage Foundation plan for a massive and concrete "dismantle[ment of] the administrative state." EPA was among its chief targets, and the document includes a chapter on the EPA written by the EPA chief of staff under Trump I, Mandy Gunasekara. As EDGI detailed in its annotation of Project 2025, Gunasekara and other authors expressed [more concern about a "pseudo-religion" of "environmental extremism"](#) than about protecting people from pollution, much less from climate change.²² They claimed (without any actual data) [the EPA had veered into "massive growth"](#) especially through the "far-reaching political goals" of the Obama administration, and needed to rid itself of "bloat," shear back its programs of research, enforcement, and environmental justice, and abandon what Gunasekara termed its "assault on the energy sector" based on "the

<https://www.princeton.edu/news/2021/12/09/political-polarization-and-its-echo-chambers-surprising-new-cross-disciplinary>.

¹⁸ Jay Lloyd, "The Strange New Politics of Science," *Issues in Science and Technology*, April 14, 2025, <https://issues.org/new-politics-science-mills-st-clair/>.

¹⁹ Marc Jacob et al., "Is a Gridlocked Congress Causing More Polarization?," *ProMarket*, June 26, 2024, <https://www.promarket.org/2024/06/26/is-a-gridlocked-congress-causing-more-polarization/>.

²⁰ Andrew Lautz and Arianna Fano, "What You Need to Know About Continuing Resolutions," Bipartisan Policy Center, February 26, 2024, <https://bipartisanpolicy.org/explainer/what-to-know-about-continuing-resolutions/>.

²¹ Michael Genovese, "Power Above Principle: How Conservatives Came to Embrace Presidential Power," *Ohio Northern University Law Review* 47, no. 1 (2023), https://digitalcommons.onu.edu/onu_law_review/vol47/iss1/3; Michael Waldman, "The Supreme Court Gives the President the Power of a King," Brennan Center for Justice Website, June 10, 2024, <https://www.brennancenter.org/our-work/analysis-opinion/supreme-court-gives-president-power-king>.

²² Roberts, "Project 2025 — Foreword — Annotated."

perceived threat of climate change.”²³ Instead, a “conservative EPA” should focus on “tangible environmental problems,” while “cutting EPA’s size and scope” in order to “deliver savings to the American taxpayer.” This vision, along with Project 2025’s authoritarian-leaning elevation of Executive over Congressional authority, reflects much of what Zeldin has pledged, sought, and done at this agency.

Undermining the EPA’s Mission

Echoing earlier EPA-hostile administrators as well as Gunasekara’s chapter on EPA in [Project 2025](#), Zeldin asserts that his and Trump’s policies will deliver to “the American people...an EPA that [effectively balances environmental protection with economic prosperity](#).” This mirrors [Gorsuch’s promise](#) of a “delicate balance” between environmental protection and “the need to improve our economy and develop affordable domestic energy resources”; [Todd Whitman’s](#) declaration that “environmental protection and economic prosperity do and can go hand in hand”; and [Pruitt’s](#) pronouncement that “we can grow our economy, harvest the resources God has blessed us with, while also being good stewards of the air, land, and water.”²⁴ Despite these similarities, Zeldin [presents the Trump II EPA as already achieving where others failed](#): “doing what many thought impossible: ensuring America has the cleanest air, land, and water on the planet while also supporting economic growth.”

By contrast, the declarations of purpose that drove EPA’s founding in December 1970 clearly centered on environmental protection, not economic growth. Republican president Richard Nixon created the agency in response to a bipartisan, widely shared consensus that forceful federal action was needed to curb pollution where private industry and piecemeal state-level controls had failed. In his [inaugural declaration of the agency’s purpose](#), its first

²³ Mandy M. Gunasekara, “Project 2025 — Environmental Protection Agency — Annotated,” Environmental Data and Governance Initiative Website, 2024, <https://envirodatagov.org/project2025-environmental-protection-agency-annotated/>.

²⁴ Anne Gorsuch, “Statement of Anne McGill Gorsuch,” U.S. Senate Committee on Environment and Public Works, May 1, 1981, <https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=200183SB.TXT>; *Hearing on the Nomination of Christine Todd Whitman: Hearing at Committee on Environment and Public Works*, United States Senate; 107th Congress First (2001). <https://www.congress.gov/107/chr/shrg69822/CHRG-107shrg69822.htm>; *Hearing on Nomination of Attorney General Scott Pruitt to be Administrator of the U.S. Environmental Protection Agency.: Hearing at U.S. Senate Committee on Environment and Public Works* (2017). <https://www.epw.senate.gov/public/index.cfm/2017/1/hearing-on-nomination-of-attorney-general-scott-pruitt-to-be-administrator-of-the-u-s-environmental-protection-agency>.

administrator Ruckelshaus (a Republican) declared: “It has no obligation to promote agriculture or commerce; only the critical obligation to protect and enhance the environment.”²⁵ EPA’s early health-based legislative mandates like the Clean Air Act led to a primary mission “to protect human health and the environment” that endures on [its website](#) even today and in the hearts and minds of career staff interviewed by EDGI researchers. “We are here to care for the American people [notes one]; that is our job, our mission.”²⁶ The importance of those commitments has been augmented by a growing body of literature showing that stricter environmental regulations can actually enhance economic growth, by [prodding innovation](#), [improving public health](#), and for climate change, lessening its [immense and growing costs](#).²⁷

Under Democratic and Republican administrations alike, the EPA has nevertheless routinely weighed narrower economic considerations against environmental protection. As one former staff member interviewed by EDGI noted, working for the EPA “doesn’t mean we’re all tree-huggers. We know how the sausage gets made. We have to come up with compromises when we do regulation, etc. We know how that’s done.”²⁸ Zeldin, however, has recast the EPA’s mission in ways that go beyond compromise, marginalizing its protective and health-shielding roles. This mission includes “[making it more affordable to purchase a car, heat homes, and operate a business](#)”; [saving “hard-earned tax-payer dollars”](#)—which if the “Big Beautiful Bill” is any indication [will go mainly to the rich](#); and “bring[ing] manufacturing into local communities.”²⁹

²⁵ William D. Ruckelshaus, “EPA’s First Administrator on the Establishment of EPA,” Speeches, Testimony and Transcripts, EPA Web Archive, December 16, 1970, <https://www.epa.gov/archive/epa/aboutepa/epas-first-administrator-establishment-epa.html>.

²⁶ Quote from EDGI’s Interviewing Project.

²⁷ Shuai Shao et al., “Environmental Regulation and Enterprise Innovation: A Review,” *Business Strategy and the Environment* 29, no. 3 (2020): 1465–78, <https://doi.org/10.1002/bse.2446>; Office of Air and Radiation, “The Clean Air Act and the Economy,” Overviews and Factsheets, U.S. Environmental Protection Agency Website, June 26, 2015, <https://www.epa.gov/clean-air-act-overview/clean-air-act-and-economy>; Robert Hart, “Climate Change Will Cost Global Economy \$38 Trillion Every Year Within 25 Years, Scientists Warn,” *Forbes*, accessed July 18, 2025, <https://www.forbes.com/sites/roberthart/2024/04/17/climate-change-will-cost-global-economy-38-trillion-every-year-within-25-years-scientists-warn/>.

²⁸ Quote from EDGI’s Interviewing Project.

²⁹ Office of the Administrator, “EPA Launches Biggest Deregulatory Action in U.S. History,” News Release, U.S. Environmental Protection Agency Website, March 12, 2025, (“more affordable”), <https://www.epa.gov/newsreleases/epa-launches-biggest-deregulatory-action-us-history>; Office of the Administrator, “Administrator Zeldin Saves Over \$1M for American Taxpayers in Canceled Media Subscriptions,” News Release, U.S. Environmental Protection Agency Website, February 15, 2025, (“taxpayers”),

While Zeldin claims to be returning the agency to its roots, he and his staff have laid out five [“strategic pillars”](#) of which only one corresponds to the original purpose set in 1970 by Ruckelshaus. Even that one—“Clean Air, Land, and Water for Every American” (Pillar 1)—shifts emphasis from a key statutory mandate for the agency by avoiding references to “public health.” Meanwhile, the other four pillars curb EPA’s ability to protect public health and well-being. Three of them, carefully aligned with White House executive orders, promise to lift environmental rules, oversight, and enforcement for favored industries while promoting fossil fuels: “Restor[ing] American Energy Dominance” (Pillar 2), “Mak[ing] the United States the Artificial Intelligence Capital of the World” (Pillar 4); and “Protect[ing] and Bring[ing] Back American Auto Jobs” (Pillar 5).³⁰ Protecting fossil fuel intensive industries, as these three pillars do, requires weakening EPA’s protections against air, water, and soil pollution. Further, it transforms EPA into an agency that encourages greenhouse emissions, rather than one that seeks to curb them and protect our nation and world against climate change.

EPA’s third new pillar, “engag[ing] in permitting reform, cooperative federalism, and cross-agency partnership,” has precedents, from Gorsuch’s [“restor\[ing\] the states to their rightful place”](#) to Project 2025’s [“permitting reform,”](#) meaning fewer environmental hurdles for corporations and industry.³¹ Additionally, Project 2025 also calls for more [“partnership with the states”](#) as well as increased cooperative federalism, despite EPA’s long-term reliance on both. It thereby echoes Gorsuch’s claim over forty years ago that “[s]tates, tribes, and local governments [are] best positioned to address the unique environmental

<https://www.epa.gov/newsreleases/administrator-zeldin-saves-over-1m-american-taxpayers-cancel-media-subscriptions>; Congressional Budget Office, *Distributional Effects of H.R. 1, the One Big Beautiful Bill Act* (Congressional Budget Office, 2025), <https://www.cbo.gov/publication/61387>.

³⁰ Office of the Administrator, “EPA Administrator Lee Zeldin Announces EPA’s ‘Powering the Great American Comeback’ Initiative,” News Release, U.S. Environmental Protection Agency Website, February 4, 2025,

<https://www.epa.gov/newsreleases/epa-administrator-lee-zeldin-announces-epas-powering-great-american-comeback>; U.S. Environmental Protection Agency (EPA), *Fiscal Year 2026: Justification of Appropriation Estimates for the Committee on Appropriations*, EPA-190R25002 (U.S. Environmental Protection Agency, 2025), ii–xi,

<https://www.epa.gov/system/files/documents/2025-06/fy-2026-epa-congressional-justification.pdf>.

³¹ U.S. Environmental Protection Agency (EPA), *Fiscal Year 2026: Justification of Appropriation Estimates for the Committee on Appropriations*, EPA-190R25002 (U.S. Environmental Protection Agency, 2025), vii (“cooperative”),

<https://www.epa.gov/system/files/documents/2025-06/fy-2026-epa-congressional-justification.pdf>; Anne Gorsuch, “Statement of Anne McGill Gorsuch,” U.S. Senate Committee on Environment and Public Works, May 1, 1981, <https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=200183SB.TXT>; Mandy M. Gunasekara, “Project 2025 — Environmental Protection Agency — Annotated,” Environmental Data and Governance Initiative Website, 2024,

<https://envirodatagov.org/project2025-environmental-protection-agency-annotated/>.

challenges facing their communities.”³² [Zeldin’s budget proposal](#), however, goes further than Gorsuch by claiming that, “many programs are mature or have accomplished their purpose,”³³ justifying near-elimination of EPA’s financial support for sub-federal programs. While Gorsuch’s talk of returning responsibilities to the states entailed proposed cuts in assistance grants of as much as 37% (in grants for water quality abatement and control),³⁴ Zeldin’s proposal includes a whopping 83% reduction in State and Tribal Assistance Grants (Figure 3).

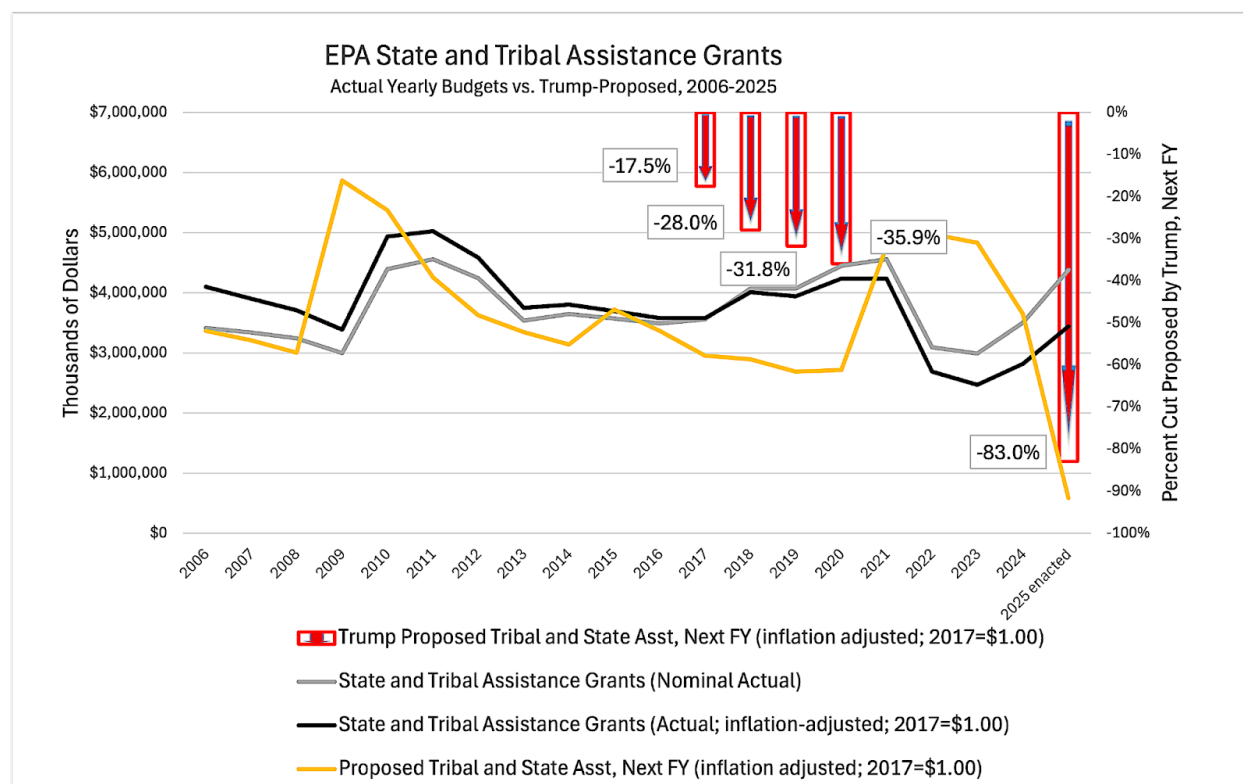


Figure 3. EPA State and Tribal Assistant Grants, 2006-2025, actual yearly budgets compared with Trump-proposed levels. Sources: EPA Congressional Budget Justifications; as compiled and analyzed here [\[link to data\]](#) by EDGI.

³² Gorsuch, “Statement of Anne McGill Gorsuch”; Gunasekara, “Project 2025 — Environmental Protection Agency — Annotated.”

³³ U.S. Environmental Protection Agency (EPA), *Fiscal Year 2026; Justification of Appropriation Estimates for the Committee on Appropriations*.

³⁴ Congressional Budget Office, *The Environmental Protection Agency: Preliminary Analysis of the Proposed 1983 Budget*, 14.

Fire-setting on Many Fronts

Building on the long tradition of conservative attacks on EPA that culminated in Project 2025, Zeldin and his staff in its first six months have not only undermined the agency's mission, they've also incinerated the legal and institutional structures that enable the EPA's ability to regulate and protect. Before announcing their formal budget request to Congress, Zeldin and his staff, with backing from the White House and DOGE, have been using the following five strategies to target this agency's inner workings, often infringing on congressional authority: deregulating, defunding, downsizing, sidelining science, and tying the hands of staff.

Deregulating

On March 12, 2025, Zeldin and his staff announced [31 "historic actions,"](#) declaring this "the greatest and most consequential day of deregulation in U.S. history."³⁵ In fact, the twelve rule reconsiderations on their list only declared an *intent* to reconsider. Apparently the long legally mandated rule-making process for all of them had barely begun, and for some, such as the "Reconsideration of regulations throttling the oil and gas industry," the rules that would actually be targeted were not specified. The rest of these "actions" were merely an assortment of pledges: to end reporting of greenhouses gas emissions, speed permitting and approval of state plans, restructure the EPA's science advisory boards and some programs such as for regional haze, and to entirely terminate two others: "Environmental Justice and DEI (EJ/DEI) [*sic*]." The stated goals were advancing "President Trump's Day One executive orders" and helping "Power the Great American Comeback," without any nod to environmental protection. Instead, proposals called for "unleashing American energy" by "driving a dagger straight into the heart of the climate change religion," "roll[ing] back trillions in regulatory costs," and "lower[ing] costs for Americans." Here and elsewhere, Zeldin and his staff leaned on sweeping claims about the costs saved through environmental deregulation without substantiating these claims.

In fact, the environmental regulations under fire by Zeldin and his staff offer economic benefits from improved human health (which reduces health care costs and boosts productivity) and community well-being, which were projected to save billions of dollars in

³⁵ Office of the Administrator, "EPA Launches Biggest Deregulatory Action in U.S. History," News Release, U.S. Environmental Protection Agency Website, March 12, 2025, <https://www.epa.gov/newsreleases/epa-launches-biggest-deregulatory-action-us-history>.

damages to people and environments. Threats to regulations under Zeldin's leadership include:

- [Delaying and reconsidering regulations to Curb Per- and Polyfluoroalkyl Substances \(PFAS\) in Drinking Water](#) (finalized 2024).³⁶
 - Public health impacts from these so-called “forever chemicals” include “developmental, cardiovascular, liver, immune, endocrine, metabolic, reproductive, musculoskeletal, and carcinogenic effects.”³⁷
 - While economic benefits from preventing most of these health effects are difficult to measure, EPA found the “measurable benefits” alone to be “approximately \$1.5 billion per year, and include avoided costs of medical bills, income lost to illness, and death.”³⁸
- [“Revisiting” stronger National Ambient Air Quality Standards \(NAAQS\) for fine particulates](#) (finalized in 2024), which worsen asthma and other respiratory problems.³⁹ The stronger NAAQS was set in part to protect children, who are particularly susceptible to air pollution.
 - Public health benefits from the strengthened standard include “up to 4,500 avoided premature deaths, 800,000 avoided cases of asthma symptoms, and 290,000 avoided lost workdays (in 2032).”⁴⁰
 - Net economic benefits: “as high as \$46 billion in 2032.”⁴¹

³⁶ Anna Clark, “Trump’s First EPA Promised to Crack Down on Forever Chemicals. His Second EPA Is Pulling Back,” ProPublica, July 2, 2025, <https://www.propublica.org/article/trump-epa-pfas-drinking-water>.

³⁷ Office of Water, “Fact Sheet: PFAS National Primary Drinking Water Regulation,” Reports and Assessments, U.S. Environmental Protection Agency Website, 2024, <https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>.

³⁸ Office of Water, “Fact Sheet: PFAS National Primary Drinking Water Regulation,” Reports and Assessments, U.S. Environmental Protection Agency Website, 2024, <https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>.

³⁹ Office of the Administrator, “Trump EPA Announces Path Forward on National Air Quality Standards for Particulate Matter (PM2.5) to Aid Manufacturing, Small Businesses,” News Release, U.S. Environmental Protection Agency Website, March 12, 2025, <https://www.epa.gov/newsreleases/trump-epa-announces-path-forward-national-air-quality-standards-particulate-matter>.

⁴⁰ Office of Air and Radiation, “Final Rule to Strengthen the National Ambient Air Quality Standards for Particulate Matter; Fact Sheet,” Overviews and Factsheets, U.S. Environmental Protection Agency Website, January 24, 2024, <https://www.epa.gov/system/files/documents/2024-02/pm-naaqs-overview.pdf>.

⁴¹ Office of Air and Radiation, “Final Rule to Strengthen the National Ambient Air Quality Standards for Particulate Matter; Fact Sheet,” Overviews and Factsheets, U.S. Environmental Protection Agency

- Reconsidering eight strengthened National Emission Standards for Hazardous Air Pollutants (NESHAPs) (all finalized in 2024).⁴² Two NASHAP pollution controls slated for rollback are:
 - [Strengthened standards for iron and steel manufacturing](#) that targeted hazardous pollutants not yet regulated for this industry, including mercury, hydrochloric acid, and cancer-causing dioxins/furans. It also clamped down on other carcinogens like chromium and fine particulates.⁴³
 - Public health benefits from the strengthened standards would have included fewer diseases, disabilities, and early deaths attributable to these hazardous air pollutants, especially in communities near iron and steel plants.⁴⁴
 - While economic benefits from reducing exposures to mercury, chromium, and other air toxics are difficult to measure, the “net benefits” of reducing this industry’s fine particulate emissions alone “could be as high as \$3.7 billion from 2026 to 2035.”⁴⁵
 - [Strengthened standards for the synthetic chemical industry](#).⁴⁶ These [cut](#) emissions of ethylene oxide and chloroprene, likely carcinogens, by 80%, while curbing over 100 other toxic air pollutants. In communities within a

Website, January 24, 2024,

<https://www.epa.gov/system/files/documents/2024-02/pm-naaqs-overview.pdf>.

⁴² Office of the Administrator, “Trump EPA Announces Reconsideration of Air Rules Regulating American Energy, Manufacturing, Chemical Sectors (NESHAPs),” News Release, U.S. Environmental Protection Agency Website, March 12, 2025, <https://www.epa.gov/newsreleases/trump-epa-announces-reconsideration-air-rules-regulating-american-energy-manufacturing>.

⁴³ Office of Air and Radiation, “Fact Sheet; Final Amendments to the National Emissions Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing Facilities,” Other Policies and Guidance, U.S. Environmental Protection Agency Website, 2024, https://www.epa.gov/system/files/documents/2024-03/final-iis-fact-sheet_1.pdf.

⁴⁴ Office of Air and Radiation, “Integrated Iron and Steel Manufacturing.”

⁴⁵ Office of Air and Radiation, “Fact Sheet; Final Amendments to the National Emissions Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing Facilities,” Other Policies and Guidance, U.S. Environmental Protection Agency Website, 2024, https://www.epa.gov/system/files/documents/2024-03/final-iis-fact-sheet_1.pdf.

⁴⁶ Office of Air and Radiation, “EPA Issues Final Rule to Reduce Toxic Air Pollution from the Synthetic Organic Chemical Manufacturing Industry and the Polymers and Resins Industries; Fact Sheet,” Other Policies and Guidance, U.S. Environmental Protection Agency Website, 2024, https://www.epa.gov/system/files/documents/2024-04/chem-sector-final-rule.-overview-fact-sheet_0.pdf.

six-mile radius of polluting facilities, these would have reduced the number of people with elevated air-toxics-related cancer risk by 96%.⁴⁷

- While “EPA is not able to estimate the full dollar value of these benefits,” it was able to calculate those from predicted reductions in ground-level ozone: \$77 million (short-term) and \$690 million (long-term, to 2038).⁴⁸

Across these rule reconsiderations, one pattern is clear. The rollback proposals emphasize cost benefits *for* polluting industries while ignoring their negative health and other costs *to* the public, especially nearby communities. This strategy aligns with the Zeldin EPA’s offensive against environmental justice, an extension of the Trump campaign against DEI. Already, EPA’s environmental justice program, which took root in the George H. W. Bush administration and for three decades helped draw the agency’s attention to more equitable and just environmental protection, has been shut down.⁴⁹ That along with Zeldin’s deregulatory campaign are erasing pollution’s costs to people and the planet while centering EPA’s regulatory decision-making around the concerns and financial interests of polluters.

On climate change, even as worsening wildfires, floods, and heat waves crowd the news headlines, the Zeldin EPA has not just denied its seriousness; it has actively sought to halt regulatory efforts that would slow it down. The most far-reaching is the proposal [to rescind the 2009 endangerment finding](#), a bridge that even Zeldin’s Trump appointed predecessor, Pruitt, thought too far. Drawing on the science available sixteen years ago, this finding declared that climate change posed a threat to Americans’ health and welfare. This in turn enabled the agency to begin taking emissions of greenhouse gases into account in regulations implementing the Clean Air Act, whether setting rules for automobile tailpipes or power plants. The proposal to rescind the endangerment finding and show that climate

⁴⁷ Office of Air and Radiation, “Synthetic Organic Chemical Manufacturing Industry.”

⁴⁸ Office of Air and Radiation, “EPA Issues Final Rule to Reduce Toxic Air Pollution from the Synthetic Organic Chemical Manufacturing Industry and the Polymers and Resins Industries; Fact Sheet,” Other Policies and Guidance, U.S. Environmental Protection Agency Website, 2024, https://www.epa.gov/system/files/documents/2024-04/chem-sector-final-rule.-overview-fact-sheet_0.pdf.

⁴⁹ Marianne Sullivan et al., “The Co-Development of Environmental Justice and Children’s Environmental Health at the EPA,” *Environmental Justice*, 18 (2), (2025): 128-136, <https://doi.org/10.1089/env.2023.0053>; Ali Rogin et al., “How the Closure of EPA Offices Puts Poor and Minority Communities at Risk,” PBS News, April 20, 2025, <https://www.pbs.org/newshour/show/how-the-closure-of-epa-offices-puts-poor-and-minority-communities-at-risk>.

change *doesn't* pose a threat to Americans' health and welfare still faces more legal and [scientific](#) hurdles than most other deregulatory proposals.⁵⁰ But if successful, it will significantly bolster other rollback efforts of 2024 tailpipe standards for cars and trucks, with an estimated "[nearly \\$100 billion of annual net benefits](#) to society"; and of 2024 greenhouse emissions standards for power plants, with estimated "[net climate and health benefits of up to \\$370 billion](#)." Among their tallied benefits, EPA officials included "the value of multiple climate change impacts, including changes in human health effects, net agricultural productivity, property damage from increased flood risk, natural disasters, disruption of energy systems, risk of conflict, environmental migration, and the value of ecosystem services."⁵¹

As accelerating climate change imposes costs that are expected to skyrocket, the Zeldin EPA has responded by seeking to limit the availability of climate-related data along with the ability to calculate climate-related costs in regulatory decision-making. Another of its deregulatory targets is the Greenhouse Gas Reporting Program (GGRP), which since 2010 has required emissions reports from the biggest climate polluters. Rather than viewing this program as an accountability mechanism for those imposing significant risks and costs to the American public, the Zeldin EPA complains that the GGRP "[imposes significant costs on the American energy supply](#)."⁵²

Zeldin also seeks an overhaul of the current method for calculating a "social cost of carbon" in cost-benefit calculations for rule-making, first hatched in the Obama era and then [taken up again by a Michael Regan-led EPA under Biden](#). The main issue that the current EPA leadership has with this method is not its inaccuracy but its "[contribut\[ion\] to significant regulatory costs](#)." This overhaul aims to minimize the estimated social costs from climate change that are considered in regulatory decision-making processes, while raising the

⁵⁰ Philip B. Duffy et al., "Strengthened Scientific Support for the Endangerment Finding for Atmospheric Greenhouse Gases," *Science* 363, no. 6427 (2019): eaat5982, <https://doi.org/10.1126/science.aat5982>.

⁵¹ Office of Air and Radiation, "What They Are Saying: Strongest-Ever Pollution Standards for Cars Will Reduce Pollution, Create Jobs, Cut Costs, and Ensure Companies and Workers Lead the Clean Vehicle Future," News Release, U.S. Environmental Protection Agency Website, March 20, 2024, <https://www.epa.gov/newsreleases/what-they-are-saying-strongest-ever-pollution-standards-cars-will-reduce-pollution>; Office of Air and Radiation, "Fact Sheet; Carbon Pollution Standards for Fossil Fuel-Fired Power Plants; Final Rule," Other Policies and Guidance, U.S. Environmental Protection Agency Website, 2024, United States, <https://www.epa.gov/system/files/documents/2024-04/cps-111-fact-sheet-overview.pdf>.

⁵² Office of the Administrator, "EPA Launches Biggest Deregulatory Action in U.S. History."

threshold for when any such costs can more legitimately be ignored.⁵³ It would make gutting or blocking climate-related policies easier, facilitating this administration's wholesale abandonment of efforts to monitor, combat, and even acknowledge climate change. Ultimately, the American public and the rest of the world will bear the costs of this administration's abandonment of statutory obligations and speeding up of planetary heating.

In addition to rolling back existing rules and contriving new calculi of environmental risks—strategies shared by its deregulatory predecessors—the Zeldin EPA has gone further to let large numbers of polluters off the hook of EPA enforcement. Invoking Section 112 of the Clean Air Act, which allows exemptions in “[rare, critical cases](#)” involving inadequate technology or “national security,” on March 8, 2025, the EPA announced a “[Presidential exemption](#)” program for toxic polluters.⁵⁴ Late in his presidency Biden offered a more limited exemption “as short as possible and no longer than two years” for commercial sterilizers that were unable to comply with a new ethylene oxide rule due to “exceptional circumstances.”⁵⁵ Zeldin’s offer, backed by Trump, went much further: Companies in any one of the eight industries covered by the air toxic standards (NESHAPs) could request an exemption from the White House, which would then decide whether to extend deadlines or otherwise exclude applicants from coverage. Backed by an [executive order dubiously declaring a “national energy emergency,”](#) the new exemptions program was further bolstered by an [April 8 executive order extending the compliance deadline of one](#) of the eight NESHAPs by two years, which by late July [applied to some 100 facilities](#).⁵⁶ These

⁵³ Latham & Watkins, “EPA Releases Updated, Elevated Estimates for the Social Cost of Greenhouse Gases,” *Environment, Land & Resources*, January 25, 2024, <https://www.globalelr.com/2024/01/epa-releases-updated-elevated-estimates-for-the-social-cost-of-greenhouse-gases/>.

⁵⁴ Office of Air and Radiation, “Clean Air Act Section 112 Presidential Exemption Information,” Announcements and Schedules, U.S. Environmental Protection Agency Website, March 24, 2025, <https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-section-112-presidential-exemption-information>; “Trump’s EPA Attempts to Hand Polluters Free Pass to Pollute Communities with Toxic Chemicals,” *Center for International Environmental Law*, n.d., accessed July 26, 2025, <https://www.ciel.org/news/trumps-epa-attempts-to-hand-polluters-free-pass-to-pollute-communities-with-toxic-chemicals/>.

⁵⁵ Joseph Biden, “Memorandum on the Orderly Implementation of the Air Toxics Standards for Ethylene Oxide Commercial Sterilizers,” *The White House*, January 16, 2025, <https://bidenwhitehouse.archives.gov/briefing-room/presidential-actions/2025/01/16/memorandum-on-the-orderly-implementation-of-the-air-toxics-standards-for-ethylene-oxide-commercial-sterilizers/>.

⁵⁶ Donald J. Trump, “Declaring a National Energy Emergency,” *The White House*, January 21, 2025, <https://www.whitehouse.gov/presidential-actions/2025/01/declaring-a-national-energy-emergency/>;

exemptions allow the White House to systematically override EPA's finalized rules for a wide range of industries, undermining the agency's own authority as well as its ability to equitably enforce existing rules for environmental protection.⁵⁷

Defunding

Another core strategy of Zeldin's EPA leadership involves terminating or freezing grants, contracts, and other expenditures. Much more quickly and aggressively than under Trump I, political appointees in the EPA under this Trump administration have overridden established decision-making, contractual, and legal practices through which EPA funds contractors and grantees. The moves against grants have gone even further as programs fully authorized by Congress have been shut down.

Several active EPA contracts were the first to go when, three days after the inauguration, DOGE registered the cancellation of \$60 million in training programs for "Diversity, Equity, Inclusion, and Accessibility." By February, they moved on to terminating contracts categorized as about "environmental justice," including their largest take-down: a \$69 million technical assistance grant program administered by EPA's Office of Civil Rights and Environmental Rights, which was itself being slated for closure. As contract cancellations extended into subscriptions and services for greenhouse gas programs, the savings shrank. By mid-June, DOGE records indicate that \$319 million in contract cancellations at the EPA produced \$177 million in savings.⁵⁸

Maxine Joselow and Friedman, Lisa, "These Companies Avoided Clean-Air Rules. It Took a Single Email," *Climate*, *The New York Times*, July 29, 2025, <https://www.nytimes.com/2025/07/29/climate/epa-air-pollution-exemptions-emails.html>; Donald Trump, "Regulatory Relief for Certain Stationary Sources to Promote American Energy," The White House, April 8, 2025, <https://www.whitehouse.gov/presidential-actions/2025/04/rregulatory-relief-for-certain-stationary-sources-to-promote-american-energy/>.

⁵⁷ Donald Trump, "Regulatory Relief for Certain Stationary Sources to Promote American Energy," The White House, April 8, 2025, <https://www.whitehouse.gov/presidential-actions/2025/04/rregulatory-relief-for-certain-stationary-sources-to-promote-american-energy/>; "EPA Issues List of Facilities Granted Clean Air Act Section 112 Presidential Exemption," American Public Power Association, April 16, 2025, <https://www.publicpower.org/periodical/article/epa-issues-list-facilities-granted-clean-air-act-section-112-presidential-exemption>; Cass R. Sunstein and Adrian Vermeule, "The Unitary Executive: Past, Present, Future," *The Supreme Court Review* 2020 (November 2021): 83–117, <https://doi.org/10.1086/714860>.

⁵⁸ "Wall of Receipts," DOGE: Department of Government Efficiency, accessed July 26, 2025, <https://x.com/doge>. Figures are drawn from lists EDGI accessed via DOGE's api, available [here](#).

At the same time, [“working hand-in-hand with DOGE,”](#) Zeldin’s office went after a bigger financial target: EPA’s grant programs, the largest of which had been set up by Congress under the Inflation Reduction Act (IRA).⁵⁹ The [first strike against grants came from](#) the OMB, which froze all grant disbursements across the Executive Branch in the administration’s first week, then backed down after an outcry and legal challenge.⁶⁰ Then the new EPA leadership began targeting programs associated with environmental justice, marking it as “DEI.” In its first 100 days, Zeldin’s office moved to cancel a Congressionally-authorized IRA appropriation for \$3 billion in environmental justice block grants. EDGI’s forthcoming analysis of 398 of these grants terminated as of June 2025 finds they would have furnished at least \$6.4 billion in economic opportunities to many of the nation’s most environmentally burdened communities in both red and blue states, adding 65,000 jobs.⁶¹ But these and all other funding environmental justice programs were deemed wasteful and eliminated. The Zeldin EPA also targeted \$20 billion that the IRA had appropriated for a Greenhouse Gas Reduction Fund (GGRF) to support clean energy projects. First freezing access to these funds, it then announced it would [“re-obligate \[them\] with enhanced controls”](#) but by early April took the [“extraordinary step” to “terminate”](#) them.⁶² As of April 29, minority party legislators of the House Appropriations Committee had tallied eight grant programs totalling \$25.6 billion that Congress had authorized the EPA to administer that had either been “cancelled/terminated” (the Environmental Justice grants) or “frozen” (all the rest) by Zeldin’s agency, with backing from DOGE and OMB (see Appendix B).⁶³

⁵⁹ Office of the Administrator, “EPA Administrator Lee Zeldin Cancels 400+ Grants in 4th Round of Cuts with DOGE, Saving Americans More than \$1.7B,” News Release, U.S. Environmental Protection Agency Website, March 10, 2025, <https://www.epa.gov/newsreleases/epa-administrator-lee-zeldin-cancels-400-grants-4th-round-cuts-doge-saving-americans>.

⁶⁰ Eric Katz, “White House Rescinds Widespread Freeze on Federal Funds That Caused Chaos inside Agencies,” Government Executive, January 29, 2025, <https://www.govexec.com/transition/2025/01/white-house-rescinds-widespread-freeze-federal-fund-s-caused-chaos-inside-agencies/402590/>.

⁶¹ Christopher Cane et al., *Highlighting What’s at Risk: Community Informed Investments in Environmental Justice* (Environmental Data and Governance Initiative, 2025).

⁶² OA US EPA, “Administrator Zeldin Announces That Billions of Dollars Worth of ‘Gold Bars’ Have Been Located at Outside Financial Institution,” News Release, February 13, 2025, <https://www.epa.gov/newsreleases/administrator-zeldin-announces-billions-dollars-worth-gold-bars-have-been-located>; Olivia Guarna, “EPA’s Attacks on Greenhouse Gas Reduction Fund and the Fate of IRA’s ‘Green Banks,’” *Climate Law Blog*, April 2, 2025, <https://blogs.law.columbia.edu/climatechange/2025/04/02/epas-attacks-on-greenhouse-gas-reduction-fund-and-the-fate-of-iras-green-banks/>.

⁶³ House Committee on Appropriations, “Trump’s Unprecedented Funding Freeze Hits Communities Across America,” April 28, 2025,

While Zeldin boasts “[taxpayer savings](#),” the ongoing and [sometimes successful](#) lawsuits and concerned monitoring by the House Appropriations Committee indicate the tenuous legal grounds of these actions.⁶⁴ By violating the expressed will of Congress for these funds these actions may well be unconstitutional in their abrogation of Congressional authority. The Government Accountability Office has opened a watchdog investigation into EPA’s withholding actions, among its 39 inquiries into the Trump administration’s handling of funds.⁶⁵ When Nixon tried a similar reappropriation of what Congress had authorized, Congress passed strict new laws for Presidential “impoundment” of funds in 1974. Project 2025 author and current OMB head Russ [Vought calls the Impoundment Act “unconstitutional”](#) and seeks to circumvent it.⁶⁶ For a while, the administration’s approach appeared to be to halt spending, then weather the ensuing legal challenges or appeal up to a Trump-favoring Supreme Court. But then, Congressional Republicans folded rescissions of many unspent but Congressionally authorized funds from the Inflation Reduction Act that the administration had frozen or terminated into “One Big Beautiful Act” (see Appendix B).⁶⁷ Its passage averted several impending legal battles, but perhaps only temporarily. The administration has floated the possibility of another rescission package for unspent EPA

<http://democrats-appropriations.house.gov/trumps-unprecedented-funding-freeze-hits-communities-across-america>.

⁶⁴ Office of the Administrator, “Administrator Zeldin Saves Over \$1M for American Taxpayers in Canceled Media Subscriptions,” News Release, U.S. Environmental Protection Agency Website, February 15, 2025,

<https://www.epa.gov/newsreleases/administrator-zeldin-saves-over-1m-american-taxpayers-canceled-media-subscriptions>; Alex Guillen, “Judge Rules EPA Termination of Environmental Justice Grants Was Unlawful,” *Politico*, June 18, 2025,

<https://www.politico.com/news/2025/06/18/epa-termination-environmental-justice-grants-unlawful-00411906>.

⁶⁵ Katherine Tully-McManus, “Trump Administration Ignores Watchdogs amid 39 Funding Investigations, GAO Says,” *POLITICO*, April 29, 2025,

<https://www.politico.com/live-updates/2025/04/29/congress/trump-administration-ignores-watchdogs-amid-39-funding-investigations-gao-says-00315459>.

⁶⁶ U. S. Government Accountability Office, “What Is the Impoundment Control Act and What Is GAO’s Role? | U.S. GAO,” accessed July 26, 2025,

<https://www.gao.gov/blog/what-impoundment-control-act-and-what-gaos-role>; Katherine Tully-McManus, “Russ Vought: Appropriations Process ‘Has to Be Less Bipartisan,’” *POLITICO*, July 17, 2025,

<https://www.politico.com/live-updates/2025/07/17/congress/russ-vought-appropriations-process-has-to-be-less-bipartisan-00459479>.

⁶⁷ Amy Turner, “The One Big Beautiful Bill Act: Considerations for Cities and Community Partners,” *Climate Law Blog*, July 7, 2025,

<https://blogs.law.columbia.edu/climatechange/2025/07/07/the-one-big-beautiful-bill-act-considerations-for-cities-and-community-partners/>.

and other agency funds in September. The agency would then be unable to spend this money until Congress acts or the fiscal year runs out on September 30, when EPA would lose the funds via a so-called “[pocket rescission](#).” Even several Congressional Republicans have expressed reservations about the constitutionality of such a move.⁶⁸

Downsizing

DOGE and Zeldin have also focused on shrinking EPA’s workforce using heavy-handed combinations of incentivized departures, early retirements, and threatened or actual Reductions in Force (RIFs). Like their counterparts in other federal agencies, EPA staff received the “[fork-in-the-road](#)” emails from Elon Musk’s DOGE team, offering a deferred resignation package and promising resignees full salaries through September 2025 if they took the offer. According to agency reports, 545 EPA staffers took advantage of the first offer, and 2617 reportedly accepted a second deferred resignation offer by the offer’s expiration in early May. Since those resigning no longer showed up to work, by the beginning of summer, [the agency had lost over 20% of its workforce](#), a blow unacknowledged in EPA’s FY26 budget justification to Congress.⁶⁹

Other staff cuts were harsher and more targeted. Almost 400 [probationary employees](#)—those hired within the previous year—were fired.⁷⁰ Subsequent successful lawsuits forced reversals of many firings, but reinstated employees remained in limbo through “administrative leave.” The next targets were staff [in the Office of Environmental Justice and External Civil Rights](#), which Trump appointees framed as a DEI program forbidden by executive order. By April, 185 of these employees had been reassigned, while

⁶⁸ Aris Folley, “Trump Team’s ‘Pocket Rescission’ Idea Runs into GOP Opposition,” Text, *The Hill*, July 27, 2025,

<https://thehill.com/homenews/administration/5421246-rescission-funding-congress-concern/>.

⁶⁹ “Original Email to Employees,” U.S. Office of Personnel Management, January 28, 2025, <https://www.opm.gov/about-us/fork/original-email-to-employees/>; Sean Reilly, “EPA Exodus Swells to over 3,000 Staffers,” *E&E News by POLITICO*, May 12, 2025,

<https://www.eenews.net/articles/epa-exodus-swells-to-over-3000-staffers/>.

⁷⁰ Rachel Frazin, “EPA Fires Nearly 400 Workers after OPM Order,” *The Hill*, February 14, 2025, <https://thehill.com/policy/energy-environment/5146618-epa-fires-employees-500-probationary/>.

[termination processes \(RIFs\) had begun for the 285 being forced out](#) of the agency.⁷¹ After a July [decision by the Supreme Court](#) allowing mass firings at the Department of Education to stand in the name of “streamlining,” [EPA announced](#) it would break-up the agency’s Office of Research and Development, and in the process, undertake another reduction of force.⁷²

The July 18, 2025, press release, while it did not say how many would soon be laid off from ORD, did sketch out the extent of the downsizing that had already taken place. In January 2025, EPA staff was reported to be 16,155, a number that apparently includes not just fulltime but parttime employees, unlike the Full-Time Equivalent (FTE) figures used in the agency’s reports to Congress, which more accurately reflect work capacity. Through early retirements, deferred resignations, and firings, the agency itself reports that cuts already undertaken will have shrunk to 12,448 (part time as well full time), a 23% percent drop by mid-July 2025.⁷³ To situate these losses among the historical—and more accurate—staffing figures this agency reports to Congress, EDGI’s calculations start with the last actual FTE staffing levels reported in EPA’s Congressional budget justification this spring: 14,534 for fiscal year 2024. Assuming most or all already-accomplished cuts to agency staff by the new administration have been full-time positions, EDGI finds the drop to be slightly higher than that offered in the agency’s press release: over 25%, a quarter of EPA staff (Figure 4).⁷⁴ Even if a substantial share of those lost positions are part time, EDGI characterizes our estimate as “hard” because many more staffing cuts are on the way. Announced staff reductions don’t yet include the reductions in force from ORD, for example, which may involve “[as](#)

⁷¹ “EPA Starts Layoffs of Environmental Justice Employees,” NBC News, April 22, 2025, <https://www.nbcnews.com/science/science-news/epa-starts-layoffs-environmental-justice-employee-s-rcna202287>; “EPA to Fire or Reassign Hundreds of Environmental Justice Employees - The Washington Post,” accessed July 26, 2025, <https://www.washingtonpost.com/climate-environment/2025/04/22/epa-staff-cuts-environmental-justice-dei/>.

⁷² Cory Turner, “Supreme Court Says Trump’s Efforts to Close the Education Department Can Continue,” Education, *NPR*, July 14, 2025, <https://www.npr.org/2025/07/14/nx-s1-5443564/trump-supreme-court-education-department>; Office of the Administrator, “EPA Announces Reduction in Force, Reorganization Efforts to Save Taxpayers Nearly Three-Quarters of a Billion Dollars,” News Release, U.S. Environmental Protection Agency Website, July 18, 2025, <https://www.epa.gov/newsreleases/epa-announces-reduction-force-reorganization-efforts-save-taxpayers-nearly-three>.

⁷³ Office of the Administrator, “EPA Announces Reduction in Force, Reorganization Efforts to Save Taxpayers Nearly Three-Quarters of a Billion Dollars,” News Release, U.S. Environmental Protection Agency Website, July 18, 2025, <https://www.epa.gov/newsreleases/epa-announces-reduction-force-reorganization-efforts-save-taxpayers-nearly-three>.

⁷⁴ U.S. Environmental Protection Agency (EPA), *FY26 Justification of Appropriation Estimates*, 3.

[many as 1,155 chemists, biologists, toxicologists and other scientists](#)” according to plans reviewed by Congressional staff, nor those who have taken a third round of deferred retirements, offered up until July 25.⁷⁵

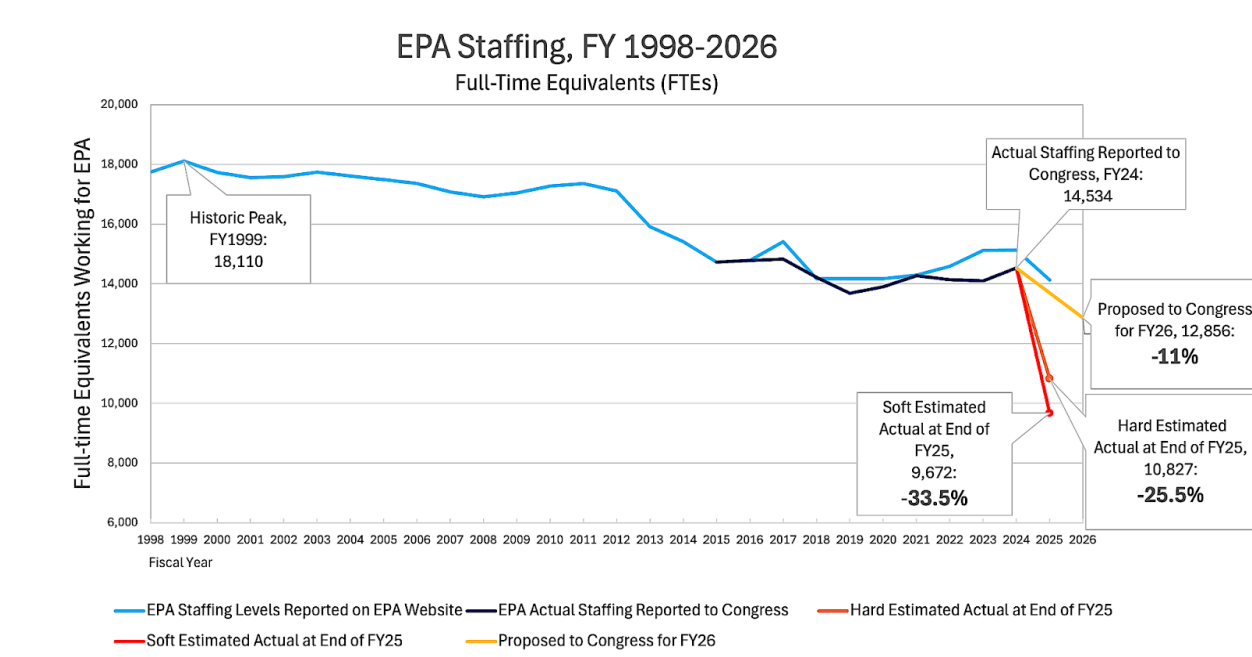


Figure 4. Trends in Overall EPA Workforce since 1998. Our hard estimate of a 25.5% actual reduction by September 30 (end of FY2025) comes from subtracting the current (non-FTE) employee departure numbers in EPA’s July 18 press release from the FY2024 actual staffing level (in FTEs) reported to Congress in EPA’s FY2026 Budget Justification (see pg. 27 for more explanation). The soft estimate of a 33.5% cut adds in the maximum cut under discussion for ORD staff. Bolstering its likelihood, even if the ORD cut doesn’t turn out to be as severe as internal documents indicate, the third round of deferred resignations, whose results are yet to be announced, may still bring the overall cut to one-third or more. Estimates here also assume the vast majority if not all departing staff were full time. Sources: EPA Website; EPA Congressional Budget Justifications; EPA Press Release, July 18, 2025. EDGI compilation of data available here [\[link to data\]](#).

The downsizing already accomplished by this agency **more than doubles the staff reduction EPA has requested from Congress in its fiscal year 2026 budget proposal** and is well on-track to triple it either by September 30 or the end of the calendar year. Zeldin’s press office boasts these cuts will bring billions of dollars in [“savings directly to](#)

⁷⁵ Matthew Daly, “EPA Eliminates Research and Development Office as It Begins Thousands of Layoffs,” PBS News, July 19, 2025, <https://www.pbs.org/newshour/politics/epa-eliminates-research-and-development-office-as-it-begins-thousands-of-layoffs>; Jory Heckman, *EPA Sends Third Deferred Resignation Offer to Some Employees*, July 17, 2025, <https://federalnewsnetwork.com/workforce/2025/07/epa-sends-third-deferred-resignation-offer-to-some-employees/>.

[American taxpayers.](#)" In discussing the downsizing, Zeldin invokes a time "[during President Ronald Reagan's administration](#)" when, he implies, a much smaller workforce—like the one to which he and his team now aspire—successfully carried out EPA's mandates. But while the current cuts to EPA resemble those enacted during Gorsuch's two-year tenure, when staffing shrank 17% to 10,882 FTEs, they actually go much further (Figure 5). By September 30, 2025, not only may Zeldin's staff cuts have taken out twice as big a share of EPA's workforce or more, they will have done so in just eight months.

Gorsuch's departure under disgrace in early 1983, while it owed much to pressures from a Democratic Congress, environmental groups, and intensive media scrutiny that may be less likely today, was also driven by the following internal problems at the agency that critics called out, many of them directly attributable to its drastic downsizing:

- **Excessive workloads and low morale:** Gorsuch's EPA "spread available resources so thin...that activities proceed[ed] at a snail's pace, if at all."⁷⁶ "With inadequate support...and no relief on the horizon, the quality and quantity of the work product [began] to reflect the fatigue and low morale of the staff."⁷⁷
- **Corruption:** With fewer career staff, the pressure to avoid "alienating [the administration's] primary constituents...the business community" pushed appointees into deepening conflicts of interest. These culminated in a "sewer gate" within the Superfund program that led to its appointed head, Rita Lavelle, being fired by Reagan, prosecuted, and sent to six months in prison. Some 20 others were also forced out of the agency, including Gorsuch.⁷⁸
- **Mismanagement:** Toward the end of Gorsuch's tenure, even the Reagan White House had become concerned and was preparing a study of "management problems at the troubled" agency.⁷⁹

⁷⁶ John Jones and Jack Smith, "Critics Of E.P.A. Are Right," *New York Times*, September 1, 1983.

⁷⁷ Editors, "The Smoking Gun at the E.P.A.," *New York Times*, March 2, 1983.

⁷⁸ Editors, "The Smoking Gun at the E.P.A.," *New York Times*, March 2, 1983; Cass Peterson and Mary Thornton, "President Fires EPA Executive: Lavelle Is Ousted; Gorsuch Dismisses 2 Other Employees President Fires EPA Official Rita Lavelle," *Washington Post*, February 8, 1983, <https://www.proquest.com/hnpwashingtonpost/docview/138082625/1013DAB6562C4164PQ/2?accountid=14172&sourcetype=Newspapers>; Christopher Sellers et al and Environmental Data and Governance (EDGI), *EPA under Siege; Trump's Assault in History and Testimony*, 100 Days and Counting (Environmental Data and Governance Initiative, 2017), <https://envirodatagov.org/publication/the-epa-under-siege/>.

⁷⁹ Phillip Shabecoff, "E.P.A. Methods May Face Study At White House: A Look at Management Is Weighed by Reagan," *New York Times*, February 26, 1983.

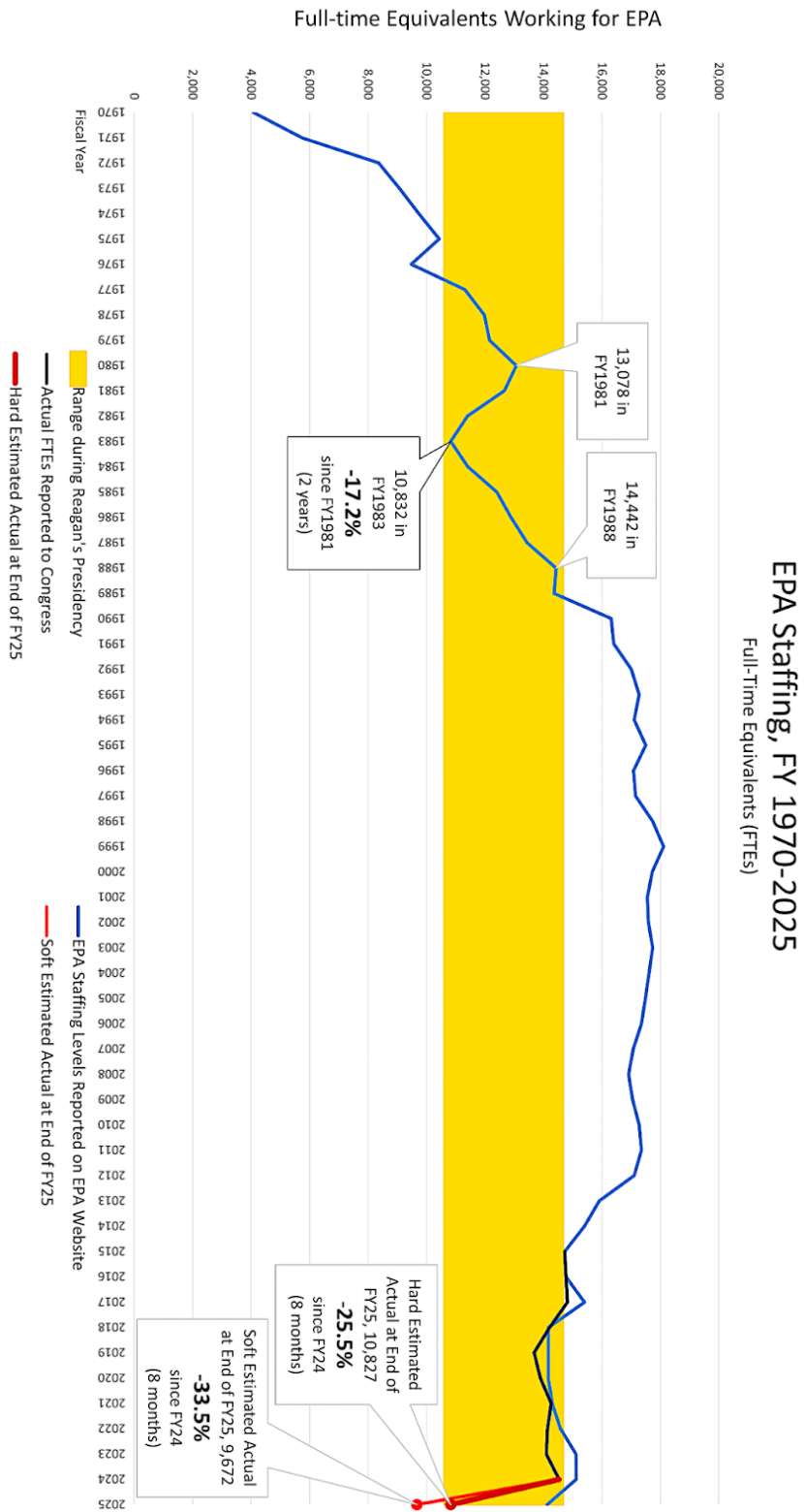


Figure 5. Zeldin's Downsizing versus Gorsuch's. Sources: EPA website; EPA Budget Justifications to Congress; EPA Press Release of July 26, 2025. EDGI compilation of data available here [\[link to data\]](#).

After Ruckelshaus replaced Gorsuch in 1983, he oversaw an expansion of the agency's workforce by 33%, to [a level above where it stood upon Zeldin's appointment as administrator](#) (Figure 6).⁸⁰

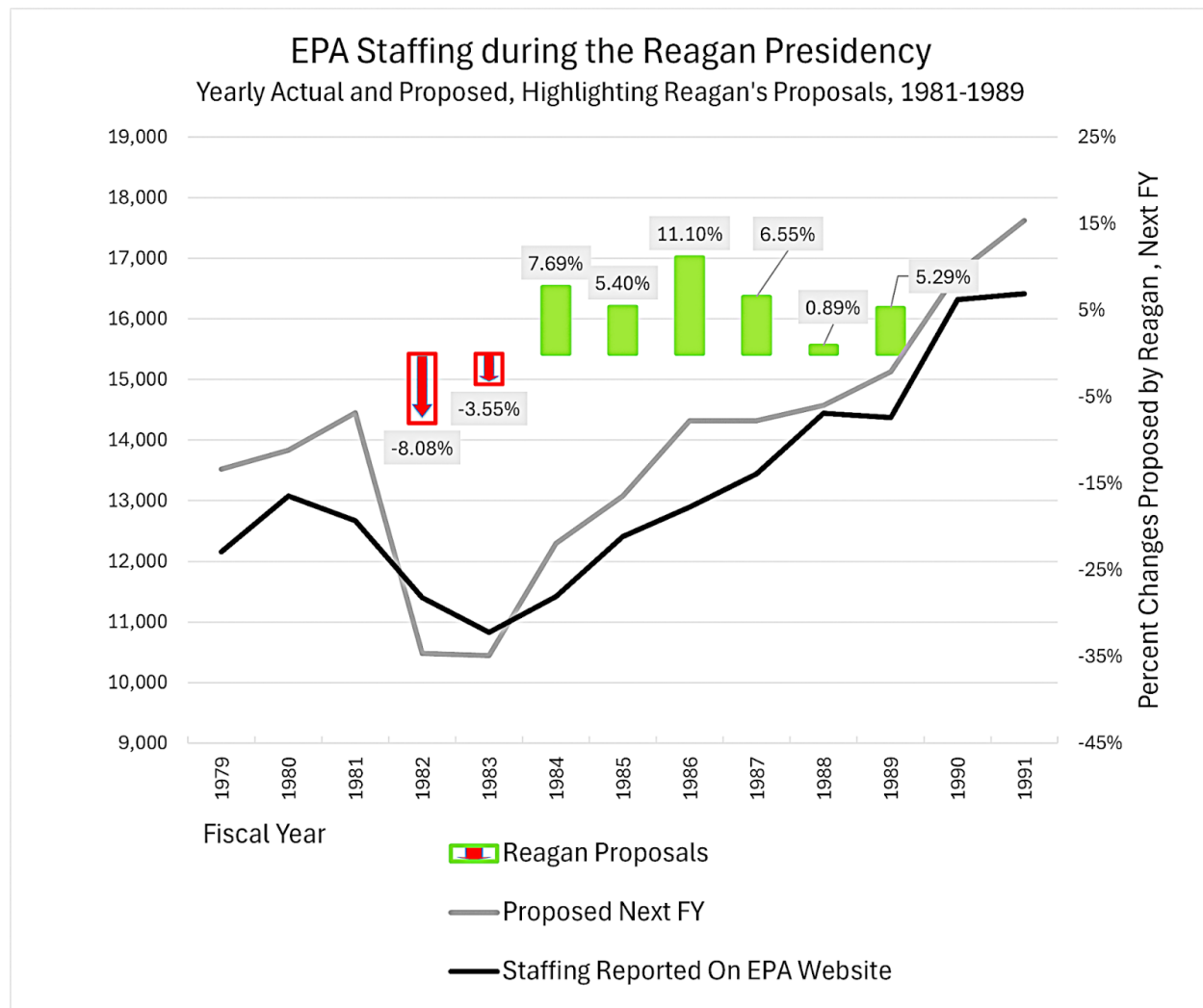


Figure 6. EPA Staffing During the Reagan Presidency. Yearly actual and proposed, highlighting Reagan's proposals, 1981-1989. Sources: EPA website; EPA Budget Justifications to Congress; [\[link to EDGI data compilation\]](#).

Zeldin's call to return the EPA to Gorsuch staffing levels glosses over this history and the Ruckelshaus expansion that followed. In fact, over the past 40 years new legislative and judicial mandates, many driven by public outcry, have necessitated staffing increases for

⁸⁰ Sean Reilly Willson Jean Chemnick, Ellie Borst, Miranda, "Zeldin Wants a 'Reagan Era'-Sized EPA. He Already Has One.," *E&E News by POLITICO*, May 7, 2025, <https://www.eenews.net/articles/zeldin-wants-a-reagan-era-sized-epa-he-already-has-one/>.

EPA. These mandates include responses to acid rain, the threat to ozone layer, inequities in hazardous waste siting (i.e., environmental justice), and climate change.⁸¹ Some of these include the:

- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, known as “Superfund”) of 1980, to clean up hazardous waste sites brought to the attention of the nation by the Love Canal crisis;
- Clean Air Act Amendments of 1990, to protect Americans against the most hazardous air pollutants;
- Food Quality and Protection Act of 1996, to strengthen controls on pesticides and improve children’s environmental health;
- Supreme Court’s decision in *Massachusetts v. EPA* (2007), which pushed the EPA into regulating greenhouse gases; and
- Frank R. Lautenberg Chemical Safety for the 21st Century Act, which set new requirements and obligations for EPA’s protections from toxic chemicals.

Today’s EPA must also reckon with environmental problems identified by researchers and scientists since the 1980s that fall squarely with its older mandates, even as there are now over 100 million more Americans to protect. Among the most prominent: PFAS (“forever chemicals”) in drinking water, landfills, and food; lead in drinking water pipes in schools and homes; smoke from wildfires; ground-level ozone; flooding of chemical plants and hazardous waste sites; and other challenges from extreme weather events that are becoming more frequent and intense due to climate change. Historically, the work of EPA’s own scientists has proven vital to the agency’s contention with newer challenges such as these.

Sidelining Science

In late June 2025, 278 current and recently fired EPA staff signed a [“declaration of dissent”](#) expressing dismay at the new administration’s sidelining of science.⁸² Hosted by the group Stand Up for Science, the letter’s signatories included [173 who revealed their full names](#),

⁸¹ Richard N. L. Andrews, *Managing the Environment, Managing Ourselves : A History of American Environmental Policy*, 3rd ed. (Yale University Press, 2020).

⁸² Stand Up for Science, “Support EPA Staff Now! — STAND UP FOR SCIENCE,” 2025, <https://www.standupforscience.net/epa-declaration>.

most of whom were forced on administrative leave by EPA leadership soon after.⁸³ Among the signatories' major concerns was the radical reorganization proposed for the EPA Office of Research and Development (ORD), the ["crown jewel of the agency,"](#) with research facilities and labs in all 10 regions. [Former EPA scientists](#) have publicly praised the ORD's accomplishments, including "transform[ing] chemical safety in the United States and abroad," not just advanc[ing] the concept of risk" but "buil[d]ing the tools to apply it," and tackling newly discovered public health threats with "in-house capacity."⁸⁴ ORD also had [support in the House of Representatives](#), where committee members recently noted its loss "willfully blinds the EPA to present environmental dangers and future environmental risks, and every American [will] be less safe because of it."⁸⁵

Ignoring its defenders, Zeldin moved ahead to ["eliminate the Office of Research and Development,"](#) whose staff of 1500 oversees EPA's ten laboratories spread across the country. Some of its staff will be transferred into "program" offices (such as for air or water), others into a new "Office for Applied Science and Environmental Solutions" (OASES), and the rest fired, including ["a majority \(50-75%\)"](#) of the scientists now working there.⁸⁶ A ["much smaller" OASES would be tightly organized](#) around short-term inquiries related to "functions" that are "statutorily required," with divisions devoted to "coastal areas, drinking water safety and methodologies for assessing environmental contamination." As commenters noted when this plan was circulated in mid-June, it would severely hamper EPA's handling of emergent environmental concerns. "The problems are going to continue

⁸³ Maxine Joselow, "E.P.A. Suspends 144 Employees After They Signed a Letter Criticizing Trump," *Climate*, *The New York Times*, July 3, 2025, <https://www.nytimes.com/2025/07/03/climate/epa-letter-administrative-leave.html>.

⁸⁴ Scott Glaberman et al., "Dismantling EPA's Research Office Jeopardizes Environmental Safety, Public Health, and US Competitiveness," *Proceedings of the National Academy of Sciences* 122, no. 24 (2025): e2508060122, <https://doi.org/10.1073/pnas.2508060122>.

⁸⁵ *Letter to Honorable Lee Zeldin: Hearing at House Committee on Science, Space, and Technology* (2025). <https://democrats-science.house.gov/imo/media/doc/2025-03-26%20EPA%20Letter.pdf>.

⁸⁶ Office of the Administrator, "EPA Announces Reduction in Force, Reorganization Efforts to Save Taxpayers Nearly Three-Quarters of a Billion Dollars"; Erik Stokstad, "In 'Blow to the Environment,' EPA Begins to Dismantle Its Research Office," *Science*, July 22, 2025, <https://www.science.org/content/article/blow-environment-epa-begins-dismantle-its-research-office>; Tracy Wholf, "EPA Shuttters Its Scientific Research Arm, with Hundreds of Scientists Expected to Be Impacted," CBS News, July 18, 2025, <https://www.cbsnews.com/news/epa-shuttters-its-scientific-research-arm-hundreds-of-scientists-expected-to-be-impacted/>.

to come. ... We can enforce the existing laws, but you're not protected from new things if you don't do this research."⁸⁷

Picking up on these critiques in late July, the Senate Appropriations Committee declared itself "appalled that the Agency has announced the imminent closure of ORD." By a vote of 26-2, including 14 of 16 Republican members, Mitch McConnell and Lisa Murkowski (the chair) among them, the committee approved a reprimand decrying "the further loss of biologists, chemists, engineers, ecologists, and other expert scientists numbering in the thousands and the closure of world-class laboratories and research centers." And it skewered the administration's boast of cost-saving: "The Agency has touted savings of \$748,800,000 in direct Federal spending, but fails to acknowledge the immeasurable risk to our health and environment."⁸⁸

Trump's "[Restoring Gold Standard Science](#)" Executive Order also looms large as a possible threat to EPA science. [Widely criticized for granting political appointees oversight over agencies' scientific research](#), the executive order resuscitates Trump I's efforts to impose a "[Strengthening Transparency in Regulatory Science rule](#)."⁸⁹ [Struck down](#) by a U.S. District Court in 2021, the "transparency" rules required science used in rule-makings—all models and analyses as well as all of the underlying data—to be made publicly available.⁹⁰ They would have barred decision-making about rules to protect public health from using public health studies based on personal health data, which is shielded from public release by privacy laws. Because the 2025 executive order calls for a similar restriction on health-protective regulations, scientists and advocates have again pushed back.

⁸⁷ Sean Reilly and Miranda Willson, "EPA Science Revamp Calls for 'Much Smaller' Office," *E&E News* by *POLITICO*, June 18, 2025,

<https://www.eenews.net/articles/epa-science-revamp-calls-for-much-smaller-office/>.

⁸⁸ Senate Appropriations Committee, *Department of the Interior, Environment and Related Agencies Appropriations Bill, 2026*, nos. 119–46 (Senate; United States Congress, 2025),

https://www.appropriations.senate.gov/imo/media/doc/fy26_interior_senate_report.pdf; Jeremy Symons, "Need Some Good News?," Substack newsletter, *Symons Says*, July 29, 2025,

https://jeremysymons.substack.com/p/need-some-good-news?publication_id=2112159&utm_campaign=email-post-title&r=315dl7&utm_medium=email.

⁸⁹ Jeff Tollefson and Dan Garisto, "Trump's Call for 'Gold-Standard Science' Has Prompted an Outcry: Here's Why," *Nature* 642, no. 8066 (2025): 13–14, <https://doi.org/10.1038/d41586-025-01668-x>; Gillian C. Goobie et al., "The Environmental Protection Agency's 'Strengthening Transparency in Pivotal Science' Rule: Don't Let History Repeat Itself," *Annals of the American Thoracic Society* 18, no. 10 (2021): 1614–17, <https://doi.org/10.1513/AnnalsATS.202103-259VP>.

⁹⁰ Juliet Eilperin, "At Biden's Request, Montana Judge Vacates Trump EPA's 'Secret Science' Rule - The Washington Post," *Washington Post*, February 1, 2021, <https://www.washingtonpost.com/climate-environment/2021/02/01/trump-secret-science/>.

[Lambasting it](#), they've observed how, in addition to ruling out consideration of policy-relevant health studies for setting environmental standards, it “consolidates political control over the Nation’s scientific infrastructure.” Among other tactics, political appointees would gain control of agencies’ oversight of scientific integrity and misconduct, opening the door to politicization and other distortions of scientific priorities, activities, and findings.⁹¹

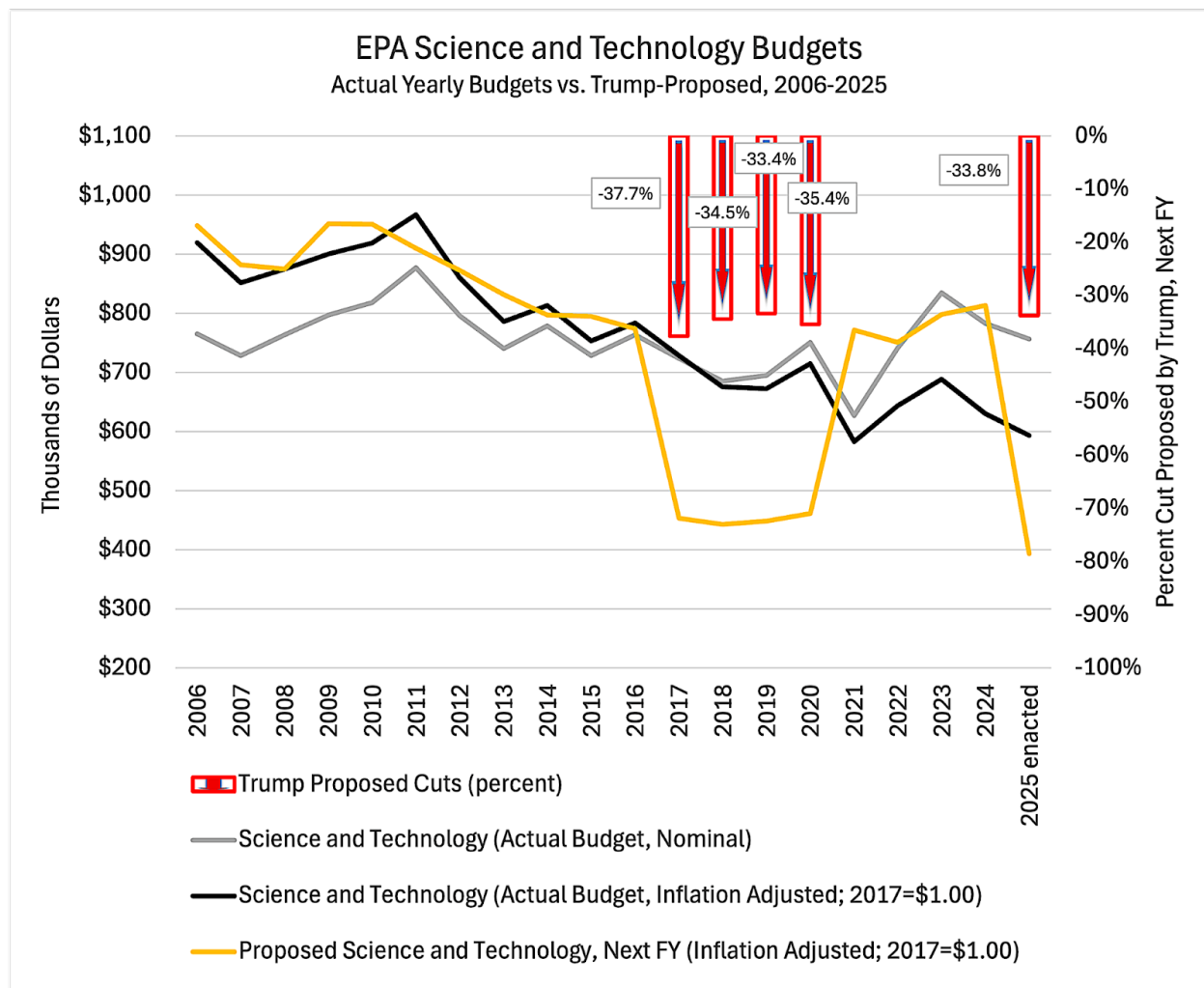


Figure 7. Proposed and Actual Budgets for Science and Technology in the EPA, FY2009-FY2026. The first proposal in Trump II is slightly less than most from Trump I. Sources: EPA Congressional Budget Justifications; EDGI data compilation here [\[link to data\]](#).

As the [Union of Concerned Scientists \(UCS\) reported](#) just before the break-up of ORD was announced, Trump II’s plans for marginalizing science across the federal government are

⁹¹ Jeff Tollefson and Dan Garisto, “Trump’s Call for ‘Gold-Standard Science’ Has Prompted an Outcry: Here’s Why,” *Nature* 642, no. 8066 (2025): 13–14, <https://doi.org/10.1038/d41586-025-01668-x>.

now well underway, with EPA among the agencies in its crosshairs.⁹² EPA was among one of several agencies that had their science advisory boards “reset,” with [three of EPA’s six](#) science advisory boards disbanded and awaiting new Zeldin-approved appointments. While UCS could only document a 5% decline in EPA’s scientific staff so far, the funding and staff cuts to EPA science and technology proposed for the 2026 fiscal year are far more severe: a 33.8% budget cut and 18.9% staff cut (Figure 7 and Figure 8). As with FY26 proposals for the agency as a whole, the proposed scientific staff cut, roughly comparable to those proposed over Trump’s first term, may well be surpassed due to pre-emptive measures undertaken by Zeldin’s office—in this case, shrinking the ORD.

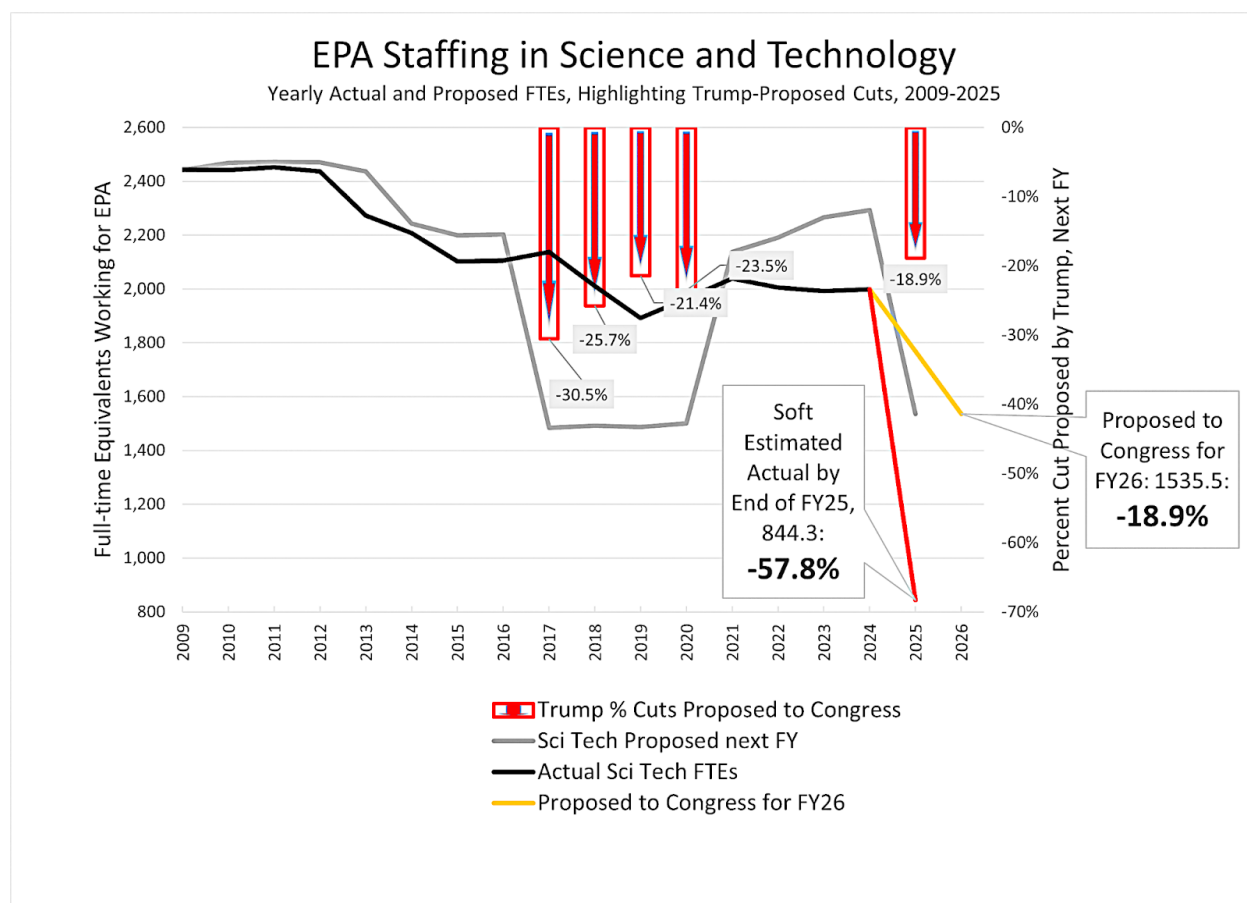


Figure 8. Proposed and Actual Staffing for Science and Technology in the EPA, FY2009-FY2026. The first proposal in Trump II is less than any from Trump I. Yet the actual cuts underway, especially once an estimated two-thirds of ORD scientists are fired (“Soft Estimated Actual”) will far exceed any Trump-era budget proposal. Here as with earlier staffing estimates, we assume that the vast majority if not all of those departing from the agency are full-time. Bolstering its likelihood, this estimate does not include the scientists among the over 2,000 staff leaving in the first two rounds of deferred resignations, whose numbers the agency has not divulged, nor

⁹² Darya Minovi et al., *Science and Democracy Under Siege* (Union of Concerned Scientists, 2025), <https://www.ucs.org/resources/science-and-democracy-under-siege>.

from the more recently ended third round. Sources: EPA Congressional Budget Justifications; Andres Picon, et al, E&E News by Politico (March 18, 2025)⁹³; EDGI data compilation here [\[link to data\]](#).

Tying the Hands of EPA Staff

One other deregulatory strategy taken up by the new administration is the direct targeting of agency staff and their work. EDGI's ongoing interviews with departing staff have illuminated how, over its first weeks and months, a new leadership deeply hostile to the agency's career staff aimed to slam the brakes on the internal workings of this agency, rivaling if not surpassing the onslaughts of the Gorsuch and Pruitt eras. From threats and intimidation to interrupted or severed workflows and the imposition of underarticulated yet immense new hurdles, the White House, DOGE, and EPA's own leadership are creating "intentional inefficiencies" to halt EPA's work.

Many staff hoped the second Trump administration would be similar to the first, when as one staff member reported, "90% of our original work" continued. But early on, a "clear aggression towards staff," largely through "language coming out of Office of Management and Budget [and] DOGE," communicated that while "we care about EPA mission...we don't like you, what you did, and you're bad, and we need to cut programs."⁹⁴ Exacerbating their fears that EPA was headed for much worse, many watched the rapid dismemberment of USAID "in horror." They wondered "is that going to be us next? ... I felt like I was on a slow line to the gallows." As the early firing of probationary workers and those in DEI and environmental justice offices unfolded, the new leadership successfully kindled a "culture of fear" within the agency. As firings, early retirements, and deferred resignations led to growing staff shortages, a hiring freeze prevented transfers, compounding the overburden of existing workloads on those who stayed. And as the hostile atmosphere pushed more to resign and retire, remaining staff also had to contend with heightened scrutiny and dread of punishment stoked by the new political appointees. One noted that, "people become very cautious and they don't want to make decisions anymore."

Complicating matters for EPA staff was the deluge of new controls imposed on them, with little understanding of the work they do. "Especially in financial transactions like all of a sudden, we couldn't move forward," one staff member said. All spending on grants and

⁹³ Andres Picon et al., "Leaked EPA Layoff Plan Would Slash Science Office," *E&E News by POLITICO*, March 18, 2025, <https://www.eenews.net/articles/leaked-epa-layoff-plan-would-slash-science-office/>.

⁹⁴ All quotes in this and next three paragraphs from EDGI's confidential interviewing project with EPA staff.

contracts was frozen and in some offices, staff reported being forbidden even from buying supplies like Kleenex tissues. Not just the freeze and ongoing abrogation of many EPA contracts but a ban on communication with outside parties meant that work with contractors ground to halt. The new processes imposed for restarting outside contacts as well as contracts and grants created further problems. All were to be checked for conformity with Trump's new executive orders, yet with only vague guidance on how that was supposed to happen. The ban on outside communications may also have stopped enforcement inspections, which require contact with those facilities to be inspected, cutting off the first step in the enforcement pipeline. Compounding all these problems, most new commands were passed along verbally, without the specificity or paper trail written guidance would have provided. Affected staff had to expend considerable time and labor figuring out what was meant and how they should respond.

Though DOGE claimed "governmental efficiency," from the standpoint of EPA staff, its collaboration with Zeldin's office led to precisely the opposite by adding unnecessary barriers and hurdles to daily work. Some staff with whom EDGI spoke concluded that's exactly what the new leadership intends. As one put it (and was echoed in other interviews), DOGE wanted to "make it super hard for us to do things" and conduct "day to day work." One interviewee noted that political appointees' "malignant neglect" of advice from EPA's career staff has hobbled the agency.

Confirming staff reports of an utter shutdown of much of the agency's work is its paltry track record compared to other administrations in public benchmarks of EPA's regulatory (not to mention deregulatory) work. As of this writing (August 2025), no Spring 2025 "Regulatory Plan" for the agency has appeared on OMB/OIRA's website, marking a historic departure from [all incoming administrations on record](#) (Biden's EPA published it March 23, 2021; Trump I's EPA on April 10, 2017; G.W. Bush's EPA on April 19, 2001).⁹⁵ In its first

⁹⁵ Office of Information and Regulatory Affairs, "Historical Unified Agenda and Regulatory Plan," Office of Management and Budget Website; Executive Office of the President, accessed August 12, 2025, <https://www.reginfo.gov/public/do/eAgendaHistory>; Victoria Arroyo, "Spring 2021 Agenda Agency Preamble--Environmental Protection Agency," Office of Management and Budget Website; Executive Office of the President, March 23, 2021, https://www.reginfo.gov/public/do/eAgendaMain?operation=OPERATION_GET_PREAMBLE_LIST¤tPubId=202104&showStage=&agencyCd=&csrf_token=9303418D7C7437E0E69A086DA2214DCB40E00428420A9C6BAE3FCEC1A45C6DBB4366CBA12CAEDA8A3465ED3EF50A21A5601A; Samantha Dravis, "Spring 2017 Agenda Agency Preamble--Environmental Protection Agency," Office of Management and Budget Website; Executive Office of the President, April 10, 2017, https://www.reginfo.gov/public/do/eAgendaMain?operation=OPERATION_GET_PREAMBLE_LIST¤tPubId=201704&showStage=&agencyCd=&csrf_token=9303418D7C7437E0E69A086DA2214DCB40

half-year the Zeldin-led EPA has also set a historical record for the fewest number of rules submitted to OMB's OIRA for review, a [stage in the rule-making process reserved for "significant" rulemaking](#) proposals (Figure 9).⁹⁶

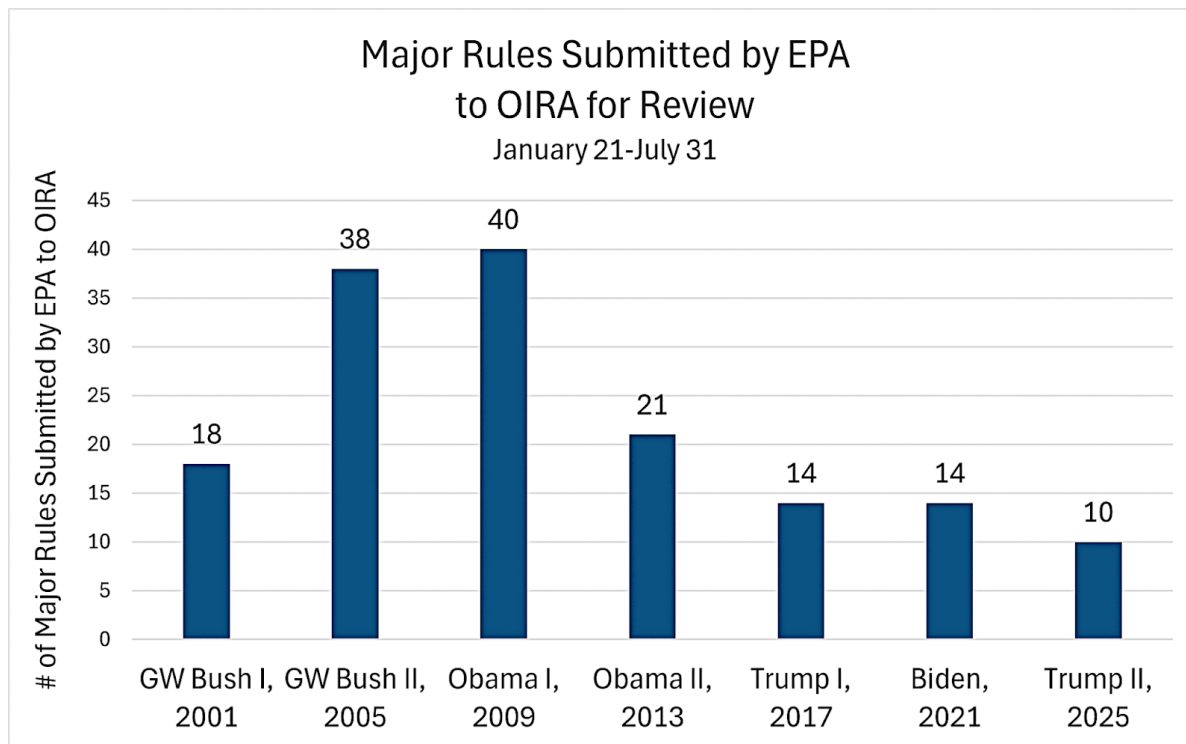


Figure 9. A Historic Low: Zeldin EPA's Rules Submitted to OIRA for Review. Source: OIRA, "Search of Regulatory Review," <https://www.reginfo.gov/public/do/eoAdvancedSearchMain>; EDGI data here [\[link to data\]](#).

Even more striking is the historic low Zeldin EPA's has attained in the *Federal Register*, where all proposed and finalized rules are supposed to be announced (Figure 10). In its first six months (January 21 to July 31, 2025), despite its press office's claims of historic deregulation, the EPA under Zeldin had proposed just three rules in the *Federal Register* by early August. Then two weeks later, another two hundred proposed and finalized rules appeared, the vast majority of them backdated to months as early as February, giving the

E00428420A9C6BAE3FCEC1A45C6DBB4366CBA12CAEDA8A3465ED3EF50A21A5601A; Thomas J. Gibson, "Spring 2001 Agenda Agency Preamble--Environmental Protection Agency," Office of Management and Budget Website; Executive Office of the President, April 19, 2001, https://www.reginfo.gov/public/do/eAgendaMain?operation=OPERATION_GET_PREAMBLE_LIST¤tPubId=200104&showStage=&agencyCd=&csrf_token=9303418D7C7437E0E69A086DA2214DCB40E00428420A9C6BAE3FCEC1A45C6DBB4366CBA12CAEDA8A3465ED3EF50A21A5601A.

⁹⁶ Office of Information and Regulatory Affairs, "FAQ--Regulations and the Rulemaking Process," Office of Management and Budget Website; Executive Office of the President, accessed August 12, 2025, https://www.reginfo.gov/public/jsp/Utilities/faq.myjsp#reg_rule.

impression that EPA had announced them to the public much earlier than it actually had. Even so, the Zeldin EPA had tallied by far the fewest of any of its 21st century predecessors, Republican or Democratic. Despite claims otherwise, this EPA's regulatory work has been the most inefficient and least productive, to date, of any EPA in the modern digital era.

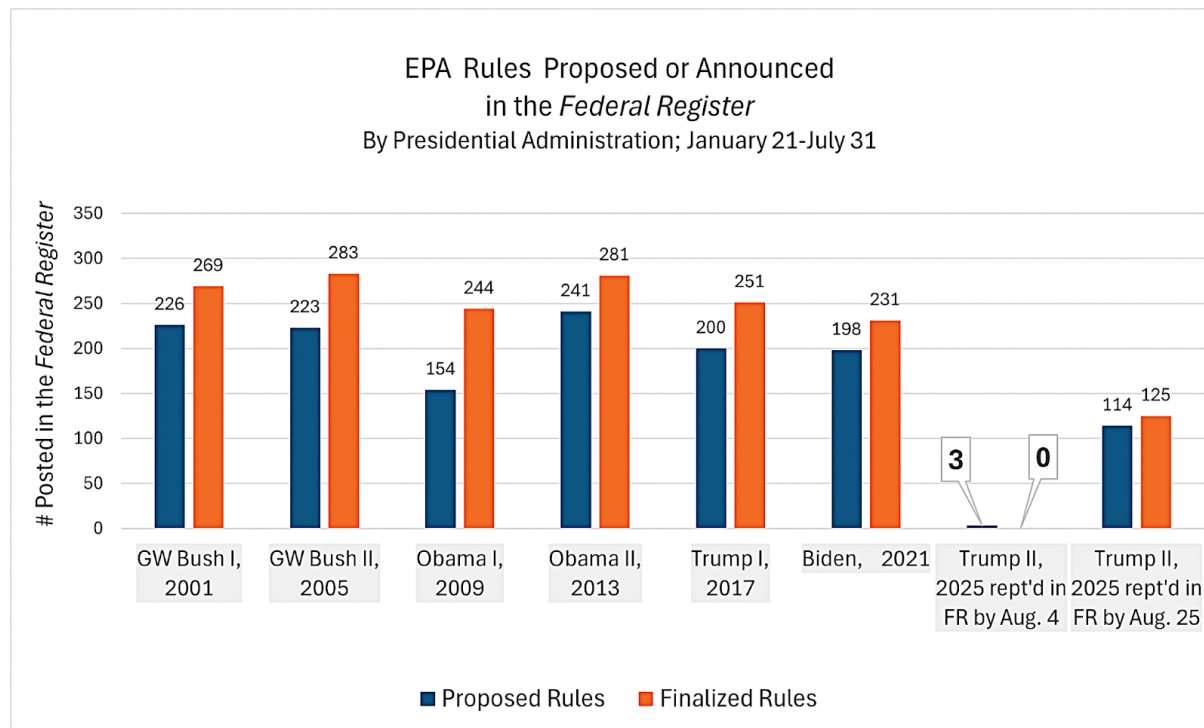


Figure 10. Another Historic Low: EPA's Rules Proposed or Announced in the *Federal Register*. Source: [Regulations.gov](https://www.regulations.gov); EDGI data compilation here [\[link to data\]](#).

Conclusion: The EPA's FY26 Budget Proposal in Context

The Zeldin EPA's radical proposal to cut its own budget by 55.4% for the next fiscal year, starting October 1, 2025, would indeed burn down much, if not most, of what this agency does. [As former EPAers Stan Meiburg and Janet McCabe have noted](#), "adjusted for inflation, it would be the smallest budget since the Ford administration."⁹⁷ Included in these cuts are the following:

⁹⁷ Janet McCabe and Stan Meiburg, "What Trump's Budget Proposal Says about His Environmental Values," *The Conversation*, June 27, 2025, <http://theconversation.com/what-trumps-budget-proposal-says-about-his-environmental-values-258962>.

- Grants for state and tribal assistance, cut by 85%;
- Science and technology funds, cut by 34%.
- Enforcement funds for environmental laws, cut 69% for civil and 50% for criminal enforcement programs;
- Funds for the brownfields program, cut by 50%;
- Operating Funds for the Superfund program cut by 100%, (making its operations totally dependent on the Superfund tax restored through Biden's Inflation Reduction Act, whose revenues thus far have fallen short of predictions).

Already, both Congressional Appropriations Committees have rejected such a deep slash to this vital agency. While Republican as well as Democratic Senators in that chamber agreed to only a 5% reduction, the House Appropriations Committee proposed its own 25% cut.⁹⁸ Though much less severe than Zeldin's proposal, the House committee's proposal would still amount to the biggest single-year slash of EPA resources by Congress in history.

In addition to the historic cuts in Zeldin EPA's formal budget proposal, Zeldin and other EPA leadership have taken measures to burn down the house without waiting for congressional approval. It has unilaterally frozen or cancelled billions in Congressionally appropriated funds and brought much of the EPA's regulatory work to a standstill and made cuts in EPA's workforce greatly surpassing those proposed to Congress and at least double what this agency has ever weathered. Meanwhile, Zeldin's press office has indicated it's concerned with savings for the wealthy and industry rather than protections for the public. "My theory," says one former staff member, is that "they want to have a lot of money not spent at the end of this fiscal year, so end of September...they'll say to Congress, 'we didn't need it.'"⁹⁹

Under Zeldin and Trump, the EPA is undermining its own capacity to provide Americans with environmental and health protections guaranteed by our nation's laws. In the process, they are unconstitutionally bypassing the legislative branch. Congress appropriated and designated many of the funding programs the Zeldin EPA unilaterally shut down and passed the foundational environmental laws the EPA is now failing to enforce.

⁹⁸ Senate Appropriations Committee, *Department of the Interior, Environment and Related Agencies Appropriations Bill, 2026*; House Committee on Appropriations, "Committee Releases FY26 Interior, Environment, and Related Agencies Appropriations Bill | House Committee on Appropriations - Republicans," July 14, 2025, <http://appropriations.house.gov/news/press-releases/committee-releases-fy26-interior-environment-and-related-agencies>.

⁹⁹ Quote from EDGI Interviewing Project.

Through the extraordinary measures laid out in this report, the EPA under Zeldin is being transformed into one that works for polluting industry and the wealthy rather than the health of the public. In deliberating over EPA's budget proposal, Congress needs to reassert its oversight authority over this critical agency. If it doesn't, Zeldin's leadership could succeed in recreating the conditions that spurred this agency's creation in the first place, including burning rivers, smog-choked cities, and millions of people sickened from unchecked pollution.

Appendix A

Regulatory Reconsiderations Announced

Rescinding the Endangerment Finding

On August 1, 2025, the Zeldin-led EPA [formally announced its proposal to rescind the 2009 Endangerment Finding](https://eelp.law.harvard.edu/tracker/greenhouse-gas-endangerment-finding/), whose assessment of the impact of climate change on public health and welfare then justified regulating greenhouse gases under the Clean Air Act. The EPA paired this announcement with another that it would reconsider greenhouse gas emissions standards on vehicles and engines. The agency held a virtual public hearing August 19 and 20; comment period closed September 15. More information:

<https://eelp.law.harvard.edu/tracker/greenhouse-gas-endangerment-finding/>

Clean Car Rules: Corporate Average Fuel Economy Standards / Greenhouse Gas Standards

The EPA paired its August 1 announcement about reconsidering the Endangerment Finding [with another that it would reconsider greenhouse gas emissions standards on vehicles and engines](https://eelp.law.harvard.edu/tracker/corporate-average-fuel-economy-standards-greenhouse-gas-standards/). Its declared intention is to roll back vehicle emission standards finalized by the Biden administration that aimed to reduce greenhouse gas emissions from the transportation sector, which contributes the most to greenhouse gas emissions in the United States. (In July 2025, Congress also zeroed out civil penalties for automakers that exceed CAFE standards, removing the major incentive for auto companies to comply with the law). More information:

<https://eelp.law.harvard.edu/tracker/corporate-average-fuel-economy-standards-greenhouse-gas-standards/>.

Power Plants Greenhouse Gas Emissions

On June 17, 2025, the Zeldin-led EPA [formally proposed dismantling standards for greenhouse gas emissions from existing coal-fired and new gas-fired power plants](https://eelp.law.harvard.edu/tracker/regulating-greenhouse-gases-for-new-and-existing-fossil-fuel-fired-power-plants/), undermining attempts to mitigate emissions from one of the largest sources of greenhouse gases in the United States. Virtual public hearings were held July 8 and the comment period ended August 7. More information:

<https://eelp.law.harvard.edu/tracker/regulating-greenhouse-gases-for-new-and-existing-fossil-fuel-fired-power-plants/>.

Volatile Organic Compounds and Methane Emissions Standards

Trump's EPA is looking to weaken emissions standards for Methane and Volatile Organic Compounds (VOCs) from oil and gas facilities finalized by the Biden EPA. On July 28, it [issued an interim final rule that extended several deadlines for compliance](#) with a 2024 rule, which environmental groups then challenged in court. Methane is a powerful greenhouse gas and VOCs are public health threats for nearby communities. More information:

<https://eelp.law.harvard.edu/tracker/epa-voc-and-methane-standards-for-oil-and-gas-facilities-2/>.

Mercury and Air Toxics Standards

On June 17, 2025, the Zeldin-led EPA [formally proposed rolling back the Biden administration's standards for mercury and air toxics from power plants](#), opening the door to increased emissions of highly toxic chemicals that are particularly dangerous for children and pregnant women. Virtual public hearings were held July 10 and the comment period ended August 11. In the meantime, White House Executive Orders declared exemptions of 74 coal-fired plants ([round 1](#), April 8; and [round 2](#), July 17) from the existing rule, moves now facing legal challenges. More information:

<https://eelp.law.harvard.edu/tracker/mercury-and-air-toxics-standards/>.

Ethylene Oxide (EtO) Emissions Standards

The Zeldin-led EPA announced in a March 21, 2025, letter to the commercial sterilizer industry that it would reconsider these standards, and on March 27, invited industry to seek exemptions from the Biden administration's strengthened regulations for ethylene oxide emissions from commercial sterilizers. On July 23, the administration [announced exemptions for 41 facilities](#). Ethylene oxide is a highly toxic, carcinogenic, and mutagenic substance; children and infants are particularly susceptible to its harms. More information:

<https://eelp.law.harvard.edu/tracker/ethylene-oxide-eto-emissions-standards-for-commercial-sterilizers/>.

Petroleum Refinery Sector Rule, National Emission Standards for Hazardous Air Pollutants (NESHAPs) / New Source Performance Standards (NSPS)

The Zeldin-led EPA [announced March 12 by press release that it will reconsider](#) deadlines and otherwise weaken standards on air pollution and hazardous chemical emissions from petroleum refineries, which will likely result in the release of more pollution and toxic chemicals, harming communities near these refineries. More information:

<https://eelp.law.harvard.edu/tracker/petroleum-refinery-sector-rule-neshaps-nsps/>.

Other Reconsiderations of National Emission Standards for Hazardous Air Pollutants (NESHAPs)

As [announced by press release March 12](#), in addition to revising standards for power plants, commercial sterilizers and petroleum refineries, the EPA has also moved to reconsider Biden-era hazardous air pollutant standards for other industries: integrated iron and steel manufacturing, rubber tire manufacturing, synthetic organic chemical manufacturing, lime manufacturing, coke ovens, copper smelting, and taconite ore processing. Many facilities in these industries also applied for and received exemptions from having to comply with Biden-era NESHAPs rules; among those dispensed by July 17 Executive Orders were those for [synthetic organic chemicals](#) and [taconite](#), in addition to more [coal-fired power plants](#).

Major Sources under the Clean Air Act

On May 22, 2025, acting under the authority of the Congressional Review Act, Congress repealed a 2024 Biden rule that required facilities reclassified from “major” to “area” sources of hazardous air pollutants to remain subject to major source standards for seven specific pollutants. This repeal means reclassified facilities may no longer face the more stringent major source standards for those hazardous air pollutants. More information: <https://eelp.law.harvard.edu/tracker/once-in-always-in-guidance-for-major-sources-under-the-clean-air-act/>.

Ozone Air Quality Standards

The Zeldin-led EPA [announced on its website on June 3 that it would be reconsidering](#) implementation of deadlines for states to submit State Implementation Plans for ozone nonattainment areas, delaying state actions on ozone air quality. More information: <https://eelp.law.harvard.edu/tracker/ozone-national-ambient-air-quality-standards/>.

Coal Ash Rule

The Zeldin-led EPA in July announced a [reconsideration of the Biden EPA's rule for compliance deadlines](#) in the safe management of coal ash, along with a final rule [to establish an “additional option for owners or operators.”](#) Less stringent disposal and management practices for coal ash would likely result in more contaminants, including mercury and arsenic, in water, soil, and air. More information: <https://eelp.law.harvard.edu/tracker/coal-ash-rule/>.

The Social Cost of Greenhouse Gases

The social cost of greenhouse gases (carbon dioxide and others) is the fundamental calculation used to construct policies and regulations to address global warming. On the first day of his second term, President Trump disbanded the interagency working group on the social cost of greenhouse gases, withdrew previous guidance, and ordered agencies to use outdated emissions estimates. The EPA announced in a press release on March 13 that it was undertaking a review of its calculations and uses of the social cost of carbon, likely leading to underestimations of the social costs of climate change impacts in subsequent regulatory analyses. More information:

<https://eelp.law.harvard.edu/tracker/the-social-cost-of-carbon/>.

<https://www.rff.org/publications/explainers/social-cost-carbon-101/>.

PFAS in Drinking Water

The Zeldin-led EPA [announced by press release in April that it would reconsider PFAS rules](#) “to combat PFAS contamination,” and then on May 14, further announced that it would delay compliance for two of these chemicals (PFOS and PFOA) and rescind standards for four others. Thereby, it has begun rewriting a Biden-era Safe Drinking Water Act (SDWA) rule that established stricter standards for dangerous PFAS chemicals in public drinking water. More information: <https://eelp.law.harvard.edu/tracker/pfas-in-drinking-water/>.

PFAS and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

Also as a part of the Zeldin-led EPA’s PFAS strategy, it [announced that it would work with Congress to exempt “passive” potentially responsible parties from liability](#) under CERCLA, the legislation authorizing a Superfund for hazardous waste clean-ups. This revision would exempt many companies that were indeed responsible for PFAS contamination and waste, and limit funds for cleanup of these “forever chemicals.” Without cleanup, PFAS chemicals will persist in the environment. More information:

<https://eelp.law.harvard.edu/tracker/pfas-and-the-comprehensive-environmental-response-compensation-and-liability-act-cercla/>.

Power Plant Effluent Limits

The Zeldin-led EPA [announced by press release in March that it was to rollback](#) the Biden administration’s recently strengthened effluent limits for wastewater discharges from steam power plants, and [at the end of June, that it would propose revising the 2024 standard by extending](#) compliance deadlines and implementing “other flexibilities” in the requirements. These changes may lead to higher levels of pollutants such as arsenic, lead,

mercury, and cadmium being discharged from power plants into water bodies. More information: <https://eelp.law.harvard.edu/tracker/power-plant-effluent-limits/>.

Regional Haze Rule

In a press release in March, the Zeldin-led EPA [announced a revamping of its policy easing requirements](#) for states planning to combat regional haze planning, which obscures visibility in national parks and elsewhere. From then through July, the agency proposed or issued final rules for 26 plans in the *Federal Register* that reflected these. The pollutants that contribute to haze, such as nitrogen oxides, sulfur dioxide, and volatile organic compounds, are also threats to public health. More information: <https://eelp.law.harvard.edu/tracker/regional-haze-rule/>.

Cross-State Air Pollution Rule/Good Neighbor Plan Rule

The Zeldin-led EPA [announced by press release in March that](#) it plans [to roll back](#) a “Good Neighbor” plan last pushed by the Biden EPA, which will loosen restrictions on how much upwind states can pollute downwind states. Delayed in its implementation by years of court cases, the “Good Neighbor” plan was dealt another blow by a Supreme Court decision that states can challenge its imposition in lower courts, rather than starting with the U.S. Court of Appeals in D.C. More information: <https://eelp.law.harvard.edu/tracker/cross-state-air-pollution-rule-history/>.
<https://www.eenews.net/articles/supreme-court-sides-with-states-in-good-neighbor-pollution-case/>.

National Ambient Air Quality Standards (NAAQS) for Particulate Matter (PM)

The Zeldin-led EPA [announced by press release in March that it planned to weaken](#) the National Ambient Air Quality Standard (NAAQS) for fine particulate matter (PM 2.5), which contributes to mortality, asthma, cardiovascular disease, cancer and many other health impacts. Then in an August 3 message to the D.C. district court where a legal challenge to the Biden-era particulates rule was being tried, the agency announced it would formally propose a reconsideration of the 2024 rule in fall 2025. More information: <https://eelp.law.harvard.edu/tracker/epa-finalized-stricter-national-ambient-air-quality-standards-naaqs-for-particulate-matter-pm/>.

New Source Review

The Zeldin-led EPA [announced its intention in March to change](#) the New Source Review (NSR) program, which establishes baseline requirements for permits governing pollution controls for new and modified industrial facilities. On July 21, it then [formally proposed to](#)

[withdraw a 2024 rule proposal setting tighter permitting standards](#) for new construction. The result will likely be that fewer facilities (power plants, factories, mills, etc.) will have to install new pollution control technologies, resulting in more harmful pollution for nearby communities. More information: <https://eelp.law.harvard.edu/tracker/new-source-review/>.

Power Plant Startup, Shutdown, and Malfunction Rule

After the Biden administration struggled in court to defend its requirements for states to address emissions during plant start-up, shutdown, and malfunction, the Trump administration will be devising a new and likely much weaker rule. These power plant events often result in higher pollution than normal operations, impacting nearby communities—and weaker rules will allow more of this harmful pollution to go unaddressed. More information: <https://eelp.law.harvard.edu/tracker/power-plant-startup-shutdown-and-malfunction-rule/>.

Stream and Wetland Water Quality Protection

The Zeldin-led EPA [announced in a March press release that it plans to revise the definition of "Waters of the United States"](#) in the Clean Water Act, with the objective of excluding extensive sections of streams and acres of wetlands from protection, potentially leading to more pollution of the nation's water resources. More information: <https://eelp.law.harvard.edu/tracker/defining-waters-of-the-united-states-wotus/>.

Greenhouse Gas Reporting Rules

The Zeldin-led EPA [announced March 12 by press release that it would reexamine](#) the Greenhouse Gas Reporting Program, which requires annual reporting from around 8,000 of the largest greenhouse gas emitting facilities in the US. On March 20, it then [extended deadlines for landfills and other covered facilities](#) to report their emissions. An [April proposal to eliminate 40 of the 41 categories of facilities](#) that were previously required to report would essentially end this program, which has provided the most comprehensive and consistent national data on the biggest contributors to emissions causing climate change for 15 years. More information: <https://eelp.law.harvard.edu/tracker/municipal-solid-waste-landfill-air-pollution-emission-standards-for-methane-and-other-pollutants/>.
<https://www.nytimes.com/2025/04/10/climate/epa-greenhouse-gas-reporting.html>.

Chemical Risk Evaluations

On March 10, the Zeldin-led EPA announced its intent to reevaluate a Biden-era rule governing chemical risk evaluations under the Toxic Substances Control Act (TSCA) in a way

that will likely weaken protections for workers and the general public. For now, litigation challenging the rule is in abeyance, and the Biden-era rule remains in effect. More information: <https://eelp.law.harvard.edu/tracker/chemical-risk-evaluations/>.

Appendix B

Congressionally Appropriated Funding Cancelled or Frozen by EPA

Source: House Appropriations Committee Democrats¹⁰⁰

Program	Amount	Executive action taken without consulting Congress	What's at stake	Status
Environmental and Climate Justice Block Grants	\$1.7 billion under the Inflation Reduction Act	EPA terminated more than 400 grants.	Funding to help communities create new jobs, spur economic development, address pollution, and transition to clean energy sources is being cut off, threatening jobs and undoing critical progress in reducing pollution and addressing climate change.	Unobligated funds then rescinded under One Big, Beautiful Act
Low Embodied Carbon Labeling	\$72 million from the Inflation Reduction Act	EPA froze funding for the program, and Trump took to end the federal Buy Clean program.	The program aimed at boosting domestic manufacturing of low-carbon construction materials, like low-carbon steel, has been upended—setting back U.S. innovation and	Unobligated funds then rescinded under One Big, Beautiful Act

¹⁰⁰ Appropriations Committee Democrats, “Trump’s Unprecedented Funding Freeze Hits Communities Across America,” June 3, 2025, <http://democrats-appropriations.house.gov/trumps-unprecedented-funding-freeze-hits-communities-across-america>.

			the manufacture and use of low-carbon materials.	
Greenhouse Gas Corporate Reporting	\$4 million from the Inflation Reduction Act	Funding was frozen.	Businesses are losing access to resources to help them estimate their upstream and downstream emissions.	Unobligated funds then rescinded by Congress in One Big, Beautiful Act
Methane Emissions Reduction Program	\$182 million from the Inflation Reduction Act	EPA froze unobligated funding for the program--and President Trump and congressional Republicans worked together to repeal the tax that would provide additional resources for the program.	Ongoing work to reduce emissions from the oil and gas sector in or near where people live, work, and go to school is being halted— putting jobs at risk and leaving more emissions and pollutants in the atmosphere.	Unobligated funds then rescinded by Congress in One Big, Beautiful Act
Clean School Bus Program	\$1 billion from the Inflation Reduction Act	Funding was frozen.	Investments to help school districts upgrade their fleets, purchase electric school buses, and reduce harmful air pollution from diesel buses has been frozen.	Unobligated funds then rescinded by Congress in One, Big, Beautiful Act
Air Investments	\$2.4 billion from the Inflation	Funding was frozen.	More harmful air pollution will be released into our communities as funding to address pollution in schools,	Unobligated funds then rescinded by Congress in One Big, Beautiful Act

	Reduction Act		emissions from diesel engines, and more is choked off.	
Greenhouse Gas Reduction Fund	\$20 billion, from the Inflation Reduction Act	EPA Administrator Lee Zeldin tried to claw back \$20 billion in funding provided from the Greenhouse Gas Reduction Fund.	Investments already committed to fund critical energy projects and initiatives like solar installation and efficiency upgrades—which will lower Americans' monthly energy bills—have been frozen. The freeze is delaying projects and putting jobs and private capital investments in serious jeopardy.	Unobligated funds then rescinded by Congress in One Big, Beautiful Act
Environmental Product Declaration Assistance	\$241 million from the Inflation Reduction Act	Funding was frozen.	Direct technical assistance, resources, and tools to help manufacturers complete Environmental Product Declarations to help spur market demand for low-carbon construction materials and products which have less climate impacts.	Unobligated funds then rescinded by Congress in One Big, Beautiful Act