The Trump Administration has made clear its plans to systematically dismantle the Environmental Protection Agency. Destroying the EPA will be a key element of the administration's fight, in the words of White House policy advisor Steve Bannon, to achieve the "deconstruction of the administrative state." [Update 8/22/17: Bannon is out, but that doesn't change the Administration's strategy or plans.] Republicans in Congress appear to support this effort. EPA Administrator Scott Pruitt, the perfect person to lead this work, quickly began the task after taking office a few weeks ago. In support of this effort, the administration is promoting a specific, negative story about why EPA exists, what its mission is, what the agency has accomplished to protect human health and the environment, and what economic impact the agency's work has had. The administration's attacks on EPA are absolutely false. Its intent is to implement an anti-public health agenda, consistent with the goals of many right-wing politicians in the U.S. today. If they succeed, the country—"red" and "blue" America alike—will suffer enormously.

The core of the administration's false story is that the EPA has acted unlawfully and against its mission, and has harmed the country. It's crucial to understand exactly why that story is wrong, and how very wrong it is. When the administration claims that EPA's efforts to protect human health and the environment constitute "overreach" and fail to provide "balance" between health and environmental protection and the profitability of corporations, it ignores that EPA's basic mission is to protect human health and the environment. Moreover, political leaders can make their attacks on EPA only by denying the massive health, environmental and economic benefits of the agency's work over the past four decades, and the legal legitimacy of EPA's work as approved by bipartisan Congresses and Republican presidents, and as confirmed by courts.

#### EPA's Mission is to Protect Human Health and the Environment

President Nixon created the EPA in 1970, for the express purpose of making a "coordinated attack" on pollution. The EPA was tasked with setting and enforcing national standards to limit air, water, and waste pollution; conducting and synthesizing research and data and using them to protect the environment; and aiding states, local governments, and private parties in reducing pollution.

The agency's mission, from the beginning, has been to protect human health and the environment. Period. In case there's any question, and at the risk of restating the obvious, here's the agency's mission statement, as reported on its website (at least for now):

The mission of EPA is to protect human health and the environment.

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That seems pretty clear. And while the mission statement was developed by the agency itself, it doesn't deviate from the clear understanding of the agency's mission from the beginning. In Nixon's 1970 proclamation establishing the EPA, now codified in Volume 5 of the U.S. Code, he articulated the agency's core activities in terms of an "attack" on pollution:

Our national government today is not structured to make a coordinated attack on the pollutants which debase the air we breathe, the water we drink, and the land that grows our food. Indeed, the present governmental structure for dealing with environmental pollution often defies effective and concerted action.

Nixon then described the "principal roles and functions" of the agency, in terms that involve coordinating and advancing protection of the environment. These include:

- —The establishment and enforcement of environmental protection standards consistent with national environmental goals.
- —The conduct of research on the adverse effects of pollution and on methods and equipment for controlling it, the gathering of information on pollution, and the use of this information in strengthening environmental protection programs and recommending policy changes.
- —Assisting others, through grants, technical assistance and other means in arresting pollution of the environment.

The language in this proclamation is pointed and intentional. The agency's job is to set enforce environmental standards, to "attack," "control," and "arrest" pollution, and to protect the environment through new policies and stronger programs. The environmental laws implemented and enforced by EPA all have similar focus and goals. While there are many specific places where the EPA must—and does—consider costs of compliance and other economic factors when it protects health and the environment, the fundamental goal of protection underpins all the work the agency does.

The Administration and other Republican Leaders Have Been Attacking the EPA for Following Its Mission

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Contrast all this with what new EPA Administrator Scott Pruitt, Republican elected officials, and the Trump administration have been doing and saying.

Let's start with the <u>remarkable media release</u> the agency put out a couple of weeks ago. The release starts by saying "American leaders and job creators all across the country today cheered as Scott Pruitt was confirmed by the U.S. Senate to become the new EPA Administrator." Testimonials by seventeen of those "leaders and job creators"—sixteen men, all of whom either represent big-business trade associations or big businesses or are Republican elected officials, plus one woman, West Virginia Senator Shelly Moore Capito—follow.

What's unusual and remarkable about this media release by the EPA is its frank and relentless assault on the EPA. The quotations are carefully drafted to paint a picture of an agency out of control—one that has forgotten its mission and its duty to the American people., and needs to be reformed. Here are some examples:

- —Granger MacDonald, Chairman, National Association of Home Builders, says that "Pruitt understands the need for a commonsense regulatory process that is based on sound science, and does not trample states' rights or ignore the economic impact on small businesses."
- —U.S. Representative David McKinley (WV) says that Pruitt "understands that we can protect our environment with common sense policies that don't attack job creators and send thousands of workers, like West Virginia's coal miners, to the unemployment line. In Oklahoma, Mr. Pruitt tirelessly fought unwarranted regulations and federal government abuse. I am confident he will bring a pragmatic and balanced approach to the EPA by returning it to its original and lawful mission."
- —Jay Ashcroft, Missouri Secretary of State, says that "as Oklahoma Attorney General, [Pruitt] has repeatedly taken on the tough fights to stop the regulatory overreach of the past decade."

By putting this on its website, the EPA Administrator attacks the EPA for doing precisely the job that President Nixon and Congress created it to do, and lauds his own efforts to prevent the agency from doing that job. I would be astonished if any federal agency head ever before displayed such contempt for the agency's core mission.

Pruitt himself has done the same in his own words. He said this recently:

Regulators exist to give certainty to those that they regulate. Those that we regulate ought to know what's expected of them so that they can plan, and allocate resources to comply. That's really the job of a regulator.

Actually, no, as Rob Glicksman has explained well. The Environmental Protection Agency's job is to safeguard the health of our residents and to protect vital resources such as our water, air, atmosphere, and soil. As Dan Farber has pointed out and as further detailed below, the "job-killing regulations" idea is false and tiresome.

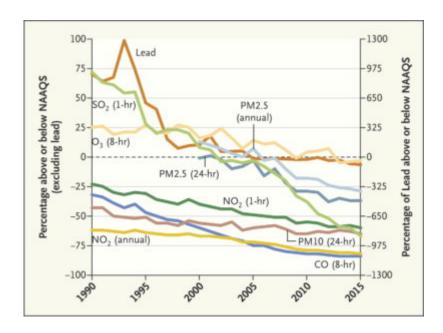
Pruitt has also, oddly, criticized the agency by claiming its efforts to address air and water quality have been weakened by the agency's focus on climate change, and <u>claimed that the agency will do a better job under his leadership</u>. This claim would be laughable if it weren't so dangerous, and is belied by Pruitt's own aggressive efforts, as Attorney General of Oklahoma, to attack air and water quality regulation.

Myron Ebell of the Competitive Enterprise Institute, a close advisor to President Trump who led his environmental transition team, publicly denies the reality of human-caused climate change and <u>said recently</u> that "the environmental movement is, in my view, the greatest threat to freedom and prosperity in the modern world."

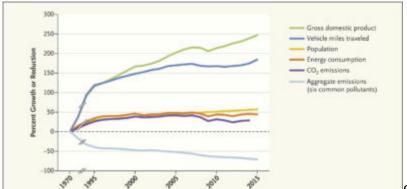
And Republican leaders in Congress have taken the same approach, <u>introducing legislation</u> <u>to hamstring the EPA further</u> in its efforts to regulate air, water, and toxics, and denying the great weight of scientific consensus on climate change.

# EPA Regulation Has Saved Lives and Created Trillions of Dollars in Net Benefits for Our Country by Employing Time-Tested, Scientifically-Valid, and Lawful Strategies

The comments in the EPA media release celebrating Pruitt, the administration's and Republican elected officials' public statements, and the onslaught of efforts to curtail agency authority promote the idea that EPA's regulatory efforts to date have been unnecessary, unusual, and even unlawful. Let's be clear: this idea is false.



First, Pruitt's science is false. EPA's work has significantly and steadily reduced pollution in air, water, and soil, with dramatic benefits to human health and the environment. It has been necessary to do this, just as Congress, many presidents, and many EPA Administrators have known it was. The graph on the right-hand side of this page (from this article in the New England Journal of Medicine) shows the progress made since 1990 in reducing the major pollutants regulated under the Clean Air Act to levels that protect human health and the environment. The progress in protecting health and the environment directly correlates with implementation of programs under the Act whose sole aim was to accomplish this goal. Moreover, in the absence of this progress, the country had dire environmental conditions, documented in many places including these photos and this website. The counterexample is right in front of our eyes: Beijing and other industrial cities in China and across the world that have failed so far to control air pollution and are paying the price.



Second, Pruitt's idea that EPA efforts

to protect health and the environment have been at odds with economic development is also

false. I think this graph (from the same article as the last graph) is instructive. As emissions have decreased steadily since 1970, and even as the rate of increase in CO2 (greenhouse pollution) emissions has begun to decrease in the past decade, GDP has grown. We've managed to keep energy consumption flat even as our driving has increased dramatically, as a result of improvements in fuel economy that have resulted from federal regulation as well as California's regulatory efforts.

Put simply, <u>claims of "job-killing regulations" are bogus</u>. This <u>recent brief report</u> by NYU Law School's Center for Policy Integrity makes that case effectively, and also includes a helpful list of questions that Congress and the media should ask rather than blindly accept claims about how regulations affect jobs.

More broadly, EPA's regulations have conferred trillions of dollars of net benefits on our country and its residents—mostly in the form of improved health and welfare from dramatic reductions in smog. A 1997 retrospective review of Clean Air Act regulation found that "an additional 205,000 Americans would have died prematurely and millions more would have suffered illnesses ranging from mild respiratory symptoms to heart disease, chronic bronchitis, asthma attacks, and other severe respiratory problems. In addition, the lack of Clean Air Act controls on the use of leaded gasoline would have resulted in major increases in child IQ loss and adult hypertension, heart disease, and stroke." Monetization of these benefits provides another way to look at the progress we've made:

When the human health, human welfare, and environmental effects which could be expressed in dollar terms were added up for the entire 20-year period, the total benefits of Clean Air Act programs were estimated to range from about \$6 trillion to about \$50 trillion, with a mean estimate of about \$22 trillion. These estimated benefits represent the estimated value Americans place on avoiding the dire air quality conditions and dramatic increases in illness and premature death which would have prevailed without the 1970 and 1977 Clean Air Act and its associated state and local programs. By comparison, the actual costs of achieving the pollution reductions observed over the 20 year period were \$523 billion, a small fraction of the estimated monetary benefits.

While the estimated net benefits may seem large, they reflect the huge differences between actual historical air quality achieved in the U.S. and a model-predicted world without the Clean Air Act in which seven metropolitan areas in the U.S. would have had higher concentrations of particulate matter (a critical pollutant responsible for much of the adverse human health

consequences) than Bangkok, Thailand. Six metropolitan areas would have been worse than Bombay, India; two would have been worse than Manila, Philippines; and one U.S. metropolitan area would even have been worse than Delhi, India (one of the most polluted cities in the world).

As the retrospective study indicates, EPA's focus on protection of health and the environment is not unusual or new, but has been consistent from 1970 through the present, and has largely been successful.

Finally, the idea that EPA has often exceeded its legal mandates is false. While Congressional Republicans, Scott Pruitt, and others have been beating this drum for a long time in the media, and Pruitt and other Republican state attorneys general have often sued the EPA to try to overturn regulations and other agency action they say is too stringent, the evidence shows otherwise. In the final weeks of the Obama administration, EPA General Counsel Avi Garbow conducted an analysis of EPA's record defending its actions under the Clean Air Act in court during the Obama administration. Former EPA Administrator Gina McCarthy summarized the memo's findings:

Today I received the <u>General Counsel's memo summarizing the results of his analysis</u> and in short, the record clearly shows that EPA followed the law and the science. Overall, EPA won or mostly won, 81% of these D.C. Circuit cases and lost or mostly lost only 10% of the cases, with the rest resulting in mixed decisions. And during the last two years, 2015-2016, EPA won 90% of the cases.

She also noted that "the judges on the D.C. Circuit are almost evenly split between those appointed by Democratic Presidents and those appointed by Republican Presidents, but Republican-appointed judges upheld EPA's actions as often as Democratic-appointed judges." Also, in some of the cases the agency lost, courts found that EPA wasn't protective enough—not that the agency regulated too stringently.

EPA's authority to regulate greenhouse gases under the Clean Air Act, a frequent target of critics, was specifically upheld by the Supreme Court in <u>Massachusetts v. EPA</u> and <u>Utility Air Regulatory Group v. EPA</u>. While EPA has often interpreted the statutes it administers in ways that sometimes maximize its own flexibility and authority, that flexibility often benefits industry as well as the environment, and is consistent with courts' approach that allows agencies to interpret ambiguous statutes in an reasonable way. Moreover, rarely

have EPA's decisions been overturned by courts as lacking a sound scientific basis when challenged as too stringent.

There is no doubt that on the whole, EPA has followed the science and the law, and that its work has created significant net benefits for our country.

## Protecting the Environment and Human Health Used to Be, But No Longer Is, a Bipartisan Goal

As many, including the first EPA Administrator Bill Ruckelshaus, who served under President Nixon, have <u>noted</u>, protecting public health and the environment used to be a bipartisan issue. At the same time, environmental protection has fared comparatively poorly in some Republican administrations—Reagan and George W. Bush. It's important that even under those administrations there was ample progress made to improve our health and environmental quality—mostly as a result of the strength of our environmental statutes, and the continuing work and integrity of the agency staff implementing those statutes in good faith, sometimes in spite of failures of leadership. These civil servants, working from administration to administration, continue to do the core work of the agency (and, as <u>Dan Farber has pointed out</u>, they may resist the new administration in myriad ways).

Now, however, we are seeing an unprecedented assault from the White House and Congressional Republican leaders on the resources, knowledge base, tools, morale, and core values of the agency. (The one other time that came close was the brief tenure of Anne Gorsuch, the first EPA Administrator under Reagan—but the worst of the damage she did was quickly stopped, when public outcry forced Reagan to dismiss her and <a href="mailto:bring-back">bring-back</a> Ruckelshaus to rescue the agency.)

In the decades before Nixon created the EPA, the country's environment <u>was in an accelerating decline</u>. Conditions were dismal, as documented in <u>these photos</u>. Smog was <u>literally killing people in our cities</u>. Toxic neighborhoods like <u>Love Canal</u> were commonplace, and not getting better. Air and water pollution and toxins from industrial wastes, pesticides, and other sources were pervasive. While states such as California were taking action, the federal government played an essential role. As California Air Resources Board Chair and former EPA Assistant Administrator Mary Nichols noted in <u>this interview</u>:

It wasn't until the Clean Air Act in 1970 that you had a law that said, "we're going to set an air quality standard based on a public health measurement, and then the government will go out and take whatever action is needed to reach

those limits." But that was a shift, and it was based on growing populist opposition to how bad the air was.

Notably, through most of the agency's history its regulatory role has been supported by bipartisan consensus. While it's hard to even imagine it today, the 1990 Clean Air Act amendments, for example, passed in Congress by a lopsided margin (401-21 in the House of Representatives (401-21) and 89-11 in the Senate). They were signed into law by President George H.W. Bush, who originally developed the basic proposals in the law. Those amendments reaffirmed the country's basic commitment to clean air and empowered the EPA to take specific, new regulatory actions in support of health and the environment.

The positive impact of environmental regulation on our country can't be overstated, in part because pollution has affected our country's people in surprising and disturbing ways that are not at all intuitive or well-known to most of us. The removal of lead from gasoline and its regulation from other sources had a dramatic, positive impact on one of our nation's most insidious, damaging public health scourges – one which was partly responsible for inner-city epidemics of crime and violence in addition to more obvious health impacts, as reported in this well-researched piece by Kevin Drum that synthesized a wide range of academic research. Research has revealed that fine particulate matter is responsible for a shocking array of health problems, in extraordinarily high numbers; consequently, successful efforts to reduce particulate-matter pollution yield phenomenal benefits far in excess of costs. And climate change will exacerbate the already difficult-to-solve problem of smog from ground-level ozone pollution, a pollutant that causes great harm to people and which EPA efforts have been helping to address but still not effectively enough.

#### The Administration Intends to Destroy EPA's Ability to Safeguard Our Future

EPA's work has become more and more important as the scope and magnitude of climate change has become more apparent. EPA has long supported efforts to reduce greenhouse gas emissions through voluntary efforts. Recently—and crucially—EPA has begun to require reduction in the greenhouse pollution that causes climate change. EPA has to do this, since the Supreme Court has ruled that greenhouse gases are "pollutants" and EPA has found, based on overwhelming scientific evidence, that emissions of those pollutants from various sources cause or contribute to endangerment of human health and the environment. The Clean Air Act thus requires the agency to regulate their emissions. The regulatory initiatives begun under President Obama, though inadequate as a remedy to climate change, have finally started to move the U.S. towards doing what it needs to do to address the most significant threat to our continued existence and prosperity.

But the administration is dedicated above all else to undoing this work along with the rest of the agency's important initiatives—and even dismantling the core capacity of the agency to meet its mission. The damage has already begun in earnest under President Trump and Administrator Pruitt, who has devoted his career to doing the bidding of fossil fuel producers through attacking the work that has achieved the results documented above. The President has directed EPA to begin the rollback of the Clean Water Rule, which protects water quality in lakes, rivers, and oceans by ensuring that protections extend to the tributaries of those waterbodies. He has announced he will revisit—and surely set back significantly—progress to raise the fuel economy of cars and reduce their greenhouse gas emissions. Pruitt has announced that he will roll back greenhouse gas emissions regulations on stationary sources and end mandatory reporting of methane and VOC emissions from oil and gas extraction. And, despite all the rhetoric of "states' rights" from the Trump administration and other Republican politicians, Pruitt's EPA will likely seek to prevent California from doing this regulatory work as well.

It appears the magnitude of budget cuts will be enormous, based on a <u>budget blueprint</u> <u>provided by the Heritage Foundation</u>. Based on <u>preliminary figures released recently</u>, he will demolish much of the core work of the agency in many parts of the country, including important programs to ensure environmental quality in the Great Lakes, Puget Sound, and Chesapeake Bay, as well as research into diesel emissions. EPA's <u>research budget is</u> <u>expected to be cut dramatically</u>, with devastating results for environmental quality.

Even more troubling, it's already clear that Pruitt's EPA will be at war with science. He's dismantling the agency's capacity to perform and evaluate scientific research, and appointing anti-science ideologues, including former staffers for Sen. James Inhofe—an unrelenting climate science denier – to important roles within the agency. Last week, <a href="Pruitt himself declared">Pruitt himself declared</a>, in response to a query whether he believes human activity to be primarily responsible for climate change, that

measuring with precision human activity on the climate is something very challenging to do and there's tremendous disagreement about the degree of impact, so no, I would not agree that it's a primary contributor to the global warming that we see.

This statement is <u>at odds with the view of virtually all serious climate scientists</u>, and contrary to the findings of both the U.S. government's <u>National Climate Assessment</u> and the <u>Intergovernmental Panel on Climate Change</u>, whose Assessment Reports have been

<u>approved</u> by all 113 participating governments (including, notably, the United States under President Bush, for the Fourth Assessment). Moreover, it's contrary to what EPA itself has determined, based on a strong factual record, when the agency found that greenhouse gases from various sources of pollution cause or contribute to endangering health and welfare. This <u>set of dynamic graphics</u> from Bloomberg News illustrates well why scientists believe emissions of greenhouse gases from human sources are responsible.

More generally, prominent scientists who have led past initiatives at the agency have expressed deep concern, including in <u>this article published in the New England Journal of Medicine</u>, summarized <u>here</u> in a helpful article by Chris Mooney. From the scientists:

As environmental scientists experienced in the development of evidence-based policy, we have several recommendations for the Trump administration. First, we believe that evidence-based decision making on the environment should not be abandoned. Reasoned action and acknowledgment of scientific truth are fundamental to democracy, public health, and economic growth. Scientific evidence does not change when the administration changes.

Second, the administration should continue to engage and seek advice from the broad community of scientists. Abraham Lincoln created the National Academy of Sciences to provide advice to the government, acknowledging the need for science to inform governance. Third, research funding and scientific capacity related to the environment should be enhanced, not reduced, to enable us to grapple with ongoing and emerging problems and to carry out the research needed to reduce the uncertainties surrounding adverse effects of environmental challenges. Cutting funding is certain to leave uncertainties unaddressed. Fourth, environmental monitoring and surveillance should be sustained and at the ready to address the inevitable emerging problems and disasters, both foreseen and unforeseen.

Fifth, since it is abundantly evident that environmental processes related to globalization and the scientifically indisputable effects of greenhouse gases will play a growing role in causing disasters and other challenges to human health, it would be inappropriate and potentially disastrous to pause action on mitigation, particularly in concert with the wider community of nations.

Finally, the administration should not abandon the majority and most critical stakeholder, the American people, for a coterie of special-interest stakeholders.

It's remarkable that we live in a time when we have to remind the President of the United States and the head of the EPA that "evidence-based decision making on the environment should not be abandoned." But we do—and without any hope that they will heed the warning, since their abandonment of evidence-based decisionmaking is ideology-based, not ignorance-based. As David Roberts noted last week in an important essay about how and why the American right rejects climate science and climate action, "the right's refusal to accept the authority of climate science is of a piece with its rejection of mainstream media, academia, and government, the shared institutions and norms that bind us together and contain our political disputes."

While the administration is abandoning science, and indeed abandoning protection of the American people, Pruitt has made clear that he sees only business interests as "stakeholders" in the EPA's work. Not only does this ignore the agency's mandate, both in its founding and in the laws it administers, but it also ignores the fact that every American benefits from work to secure protection of health and the environment. And even beyond that, it ignores an important and growing trend in environmentalism over the past four decades: the recognition that environmental quality and health are issues of equal justice under law and of human rights, and that the victims of poor environmental quality are generally those who lack political power: the poor and communities of color. (Indeed, the environmental justice programs at EPA are on the verge of collapse at the hands of the new administration, and the longtime head of these programs recently resigned with pointed criticism of the direction of the agency.)

This is not about "balance" or "overreach." It's important to taken deadly seriously the stated intent to deconstruct the administrative state.

# Pruitt's EPA Will Backslide from Current Progress and Fail to Fulfill the Agency's Mission, But There Are Still Some Possible Checks on How Far It Can Go

EPA's purpose, still on its website for now, is to ensure that:

- —all Americans are protected from significant risks to human health and the environment where they live, learn and work;
- —national efforts to reduce environmental risk are based on the best available scientific information;
- —federal laws protecting human health and the environment are enforced fairly

#### and effectively;

- —environmental protection is an integral consideration in U.S. policies concerning natural resources, human health, economic growth, energy, transportation, agriculture, industry, and international trade, and these factors are similarly considered in establishing environmental policy;
- —all parts of society communities, individuals, businesses, and state, local and tribal governments have access to accurate information sufficient to effectively participate in managing human health and environmental risks;
- —environmental protection contributes to making our communities and ecosystems diverse, sustainable and economically productive; and
- —the United States plays a leadership role in working with other nations to protect the global environment.

The Trump/Pruitt EPA is certain to fail at all these objectives—or more accurately, it's certain to intentionally sabotage its ability to meet these objectives. Despite the strong mandates of our environmental laws and the progress made so far by EPA, the agency simply won't be able to do its job if crippled by a White House determined to deconstruct the administrative state through starving the agency of resources, belittling and eviscerating the agency's scientific research, and loosening and failing to enforce standards. At the same time, Courts are quite deferential to agencies' legal and scientific judgments, and agencies thus have a lot of latitude to make changes in course, even where those changes make bad policy.

There are, however, three reasons to have hope they won't succeed completely at failing. First, EPA's current regulatory programs are based on sound science, and follow the law, and our administrative process will make it difficult to quickly undo those programs. To change many of its programs, EPA would need to engage in new rulemakings and other processes, and to underpin changes in policy with data and legal authority. Undoing EPA's work may prove slow and difficult, especially where legal and scientific judgments clearly support current EPA policy. Second, in general, courts do not tolerate agency decisionmaking that lacks scientific or legal basis, or that seems to be undertaken in bad faith. The new administration's lack of good faith is already so apparent, and its attention to facts and law so sloppy so far, that it will be unable to justify to courts many of the policy changes, legal interpretations, and other judgments it wishes to enact. Finally, dedicated

EPA staff and state agency officials—who manage many EPA programs delegated to the state level—will surely step up, along with stakeholders who support protection of health and the environment. Lawyers, scientists, and other government employees and consultants, as well as outside experts and advocates, will help to hold back the rollbacks by maintaining their integrity and relentlessly questioning the agency's work, even as the civil service is mischaracterized by the administration as an illegitimate "Deep State" and otherwise attacked.

#### What Next?

People have short memories. We take for granted what we've achieved. And we've achieved a lot; few U.S. residents have to live in palpably unhealthy and unsafe conditions anymore. Because many of the remaining environmental risks—whether increased cancer risk or the harms of climate change—are invisible or hidden, they aren't salient to most of us. And so we get complacent.

What's most pernicious is that the most significant harms will fall disproportionately on the politically disempowered, including, especially, economically disadvantaged communities. This means that many communities of color, and also many mostly-white communities in rural areas with severe public health impacts, are at special risk. While EPA's protections have helped all Americans, anyone <u>living in the shadow of a freeway, oil refinery</u> or production well, hazardous waste facility, or <u>coal-fired power plant</u> still suffers much larger risks than the population in general. Moreover, these communities aren't as resilient to health risks because they typically have less access to health care. Rolling back health-protective regulations will put them at even greater risk and will erase gains already made.

EPA's mission is to protect human health and the environment, full stop. The overall benefits of the agency's work are undeniable to anyone with a clear understanding of the science and economics of EPA's regulatory programs. And its efforts have followed the law in good faith. Because lives are on the line, we have to work at holding it to its mission, even if we don't see the need for it every day in our own lives. Over time, if the administration succeeds in weakening or dismantling its regulatory programs, it will be harder and harder to get them back. Advocates, scientists, and ordinary folks need to be relentless in holding the administration to account for undercutting the mission of the agency; it's time to get to work.

[note: minor revisions made to correct typos, add a couple of links, and revise reference to Steve Bannon]

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