



Donald Trump could “F” the federal government. Literally.

Far-right policy strategists are laying plans, largely endorsed by the Trump campaign, for getting rid of federal government workers who might otherwise stand in the way of a radical deregulation agenda. It’s called “Schedule F,” and it could be used to strip employment protections from as many as 50,000 federal employees. That would allow a Trump administration to exert far more influence over personnel at agencies like the Environmental Protection Agency than if they just placed the 4,000 political appointees that presidents usually get to install across government. The goal is to stack thousands of *mid-level* staff jobs with vetted, pre-approved Trump loyalists—including loyalists who agree that the threat of climate change is overstated.

“We will put unelected bureaucrats back in their place,” Trump says in a [campaign video](#).

None of this is a stretch. Trump did it once before. On October 21, 2020, he signed an [executive order](#) “On Creating Schedule F in the Excepted Service.” That executive order established a new employment category for federal employees to

create “a greater degree of appointment flexibility with respect to these employees.” Translation: It converted certain civil service positions to at-will appointments and removed rights to appeal, streamlining the process for removing them. The order was opposed by Democrats and some Republicans in Congress, but thankfully there wasn’t enough time for it to wreak havoc before it was quickly reversed by President Biden during his first week in office.

Like other elements of a possible second Trump term, this Schedule F scheme would be relaunched with much more pre-planning than Trump 1.0. “What we’re trying to do is identify the pockets of independence and seize them,” Russell T. Vought told the New York Times last year. Vought ran the Office of Management and Budget in the Trump White House and now runs the [Center for Renewing America](#). He’s one of the main contributors to [Project 2025](#), the battle plan for a Trump transition (read [more on the architects of this plan here](#)).

When MAGA Republicans talk about “unelected bureaucrats” they are often referring to national security employees and intelligence officers who make up the so-called Deep State. But these efforts to radically remake the civil service would also target the engineers, scientists, and environmental lawyers who help implement, and enforce, science-based environmental regulations.

Downsizing the EPA is an explicit goal, and it couldn’t come at a worse time. Mandy Gunasekara, a former Trump EPA official, wrote Project 2025’s chapter on EPA. She [told NPR](#) last summer that “the Environmental Protection Agency recently has become an instrument of overregulation, where there is a lot of excess in terms of the bureaucracy and staffing and process.”

In fact, the EPA is just starting to bounce back after the agency was hollowed out under Trump. His administration kicked scientists off two key EPA advisory panels, the Science Advisory Board and the Clean Air Scientific Advisory Committee, replacing them with people who were happy to question the need to regulate planet-warming greenhouse gases. Others simply quit or retired. As recently as a year ago there were reports of [EPA staffers still struggling](#) with workload and low morale.

The EPA now has a budgeted workforce of 15,115. That’s up only slightly from the Trump years, but down compared to previous administrations, including that of George W. Bush. The proposed FY 2024 budget covers 17,077 FTE (full time equivalent) at the EPA, which includes more than 1,900 new FTE to address the

agency's growing priorities and responsibilities. The agency has been making a mad dash to finalize a half dozen rules and regulations that are essential to U.S. climate goals.

The EPA's enforcement actions against polluters are just starting to rebound too. The agency opened 199 criminal cases in fiscal year 2023. That's an increase of 70 percent over the year before and equals the highest total since fiscal year 2020, [according to EPA data](#). The agency initiated 1,751 civil enforcement actions, nearly a hundred more than the year before and its most in a year since 2018. EPA also reached 1,791 civil settlements, 150 more than the previous year, [E&E News reported](#).

Imagine what happens to the hundreds of civil and criminal cases against polluters if a second Trump administration deploys a streamlined process for pink-slipping civil servants who do not share the pro-business, deregulation views of the politically appointed managers. Picture the exodus of longtime experts who can't stomach another Trump EPA, not to mention the brand-new employees who got hired to help implement landmark climate laws but will see their service end before it begins. "People will lose their jobs," Kevin D. Roberts head of the Heritage Foundation told Lulu Garcia-Navarro in [a recent interview](#). "Hopefully their lives are able to flourish in spite of that. Buildings will be shut down. Hopefully they can be repurposed for private industry," he says. Destroying the administrative state would be bad for everyone, not just those losing their 9-to-5.

The 'death of expertise' in American culture is not new, but this would be next level. The first Trump administration managed to install hostile non-experts in *leadership* positions, but not middle management. I think of Rick Perry, who was appointed to lead a department that he'd previously proposed abolishing AND forgot the name of during a debate. Meanwhile most staffers at the Department of Energy remained committed to the agency's mission. This Schedule F scheme would instead target those experts in cubicles and field offices around the country who do the day-to-day work of keeping our air and water safe. I think most Americans agree that if there's a chemical explosion in their city, they want experts and not political loyalists attending to the emergency.

In many ways, this approach resembles the campaign waged by Republicans during Trump's first term to remake the federal judiciary by appointing judges to district and appellate courts. The Trump administration and then-Senate Majority Leader Mitch McConnell [confirmed more judges](#) at a faster rate than any recent

administration other than Jimmy Carter's. Why focus only on Supreme Court nominees when lower court judges hear exponentially more cases every year?

There are a few proposals for how to Trump-proof the federal workforce, though none of them are guaranteed. Rep. Gerry Connolly, a Democrat from Virginia, is pushing a legislative fix that would require congressional approval for any plan to create new employee designations within the federal workforce. "I don't think there's sufficient appreciation of what a threat this poses," Connolly [told NBC](#) a few weeks ago. There's a second effort in the form of an Office of Personnel Management (OPM) [regulation, introduced in September](#), that would tighten civil service protections.

One potential impediment to a Trump administration's plans to decimate the EPA specifically is a new union contract. [Going on right now is a labor mediation](#) between EPA management and American Federation of Government Employees Council 238, the union that represents about 8,000 EPA employees over a new contract. One provision has to do with championing scientific integrity, which was a major complaint under the Trump administration. The union's president has framed that provision as necessary "to ensure our ability to protect human health and the environment is preserved no matter who is in power." And the EPA is quite close to publicly releasing its plan for shielding science across the federal government, with a scientific integrity policy, [Kevin Bogardus reports](#).

But the Trump campaign and well-funded far-right right groups, like Center for Renewing America and the Heritage Foundation, have other reorganization plans for bringing relatively independent agencies under the thumb of the president that aren't just about personnel. "I will sign a law to ban bureaucrats from taking any enforcement action based on informal guidance alone," Trump says in [this video](#). "These agencies do not get to become a fourth branch of government, issuing rules and edicts all by themselves and that's what they've been doing."

That's *not* what they've been doing. But next in this series, we'll look at current and pending environmental rules as well as policy proposals at stake in Election 2024.