When the Heritage Foundation released Project 2025, there was a big hullabaloo, and Trump quickly disowned it. Bad as it was, however, it appears Project 2025 apparently failed to anticipate the full sweep of Trump's second term. Many of Trump's actions mirror Project 2025 recommendations, but in some key areas he's gone much further. Here are some quotes from Project 2025, paired with a summary of what Trump has actually done.

"Returning the environmental justice function to the AO [EPA Administrator's Office], eliminating the stand-alone Office of Environmental Justice and External Civil Rights."

Trump did eliminate the environmental justice office, as recommended, but he went much further by eliminating environmental justice entirely.

"Establish a system, with an appropriate deadline, to update the 2009 endangerment finding."

No system seems to have been established for updating science. Rather, EPA grabbed a shoddy DOE report by some outlier scientists and added a grab-bag of legal arguments.

"Establish GHG car standards under Department of Transportation (DOT) leadership that properly consider cost, choice, safety, and national security."

The Administration didn't bother with the pretense of systematic review of the evidence. Instead, EPA is proposing to eliminate GHG car standards entirely. It is also attempting to water down fuel efficiency standards so much that they'll have little practical relevance.

"Revise general implementing regulations for existing source regulatory authority under CAA § 111(d) to ensure that EPA gives full meaning to Congress's direction, including source-specific application, and that the state planning program is flexible, federalist, and deferential to the states."

Instead, the Administration argues that section 111(d) standards should be abolished completely because U.S. power plant emissions are not "significant."

"Affirm an 'all of the above' energy policy through which the best

attributes of every resource can be harnessed for the benefit of the American people.”

Policy is fossil fuels and nuclear only, not “all of the above.” The result has been to limit power supplies at a time when data centers are surging electricity demand.

“American science dominance is critical to U.S. national security and economic strength. The next conservative President therefore needs to recommit the United States to ensuring this dominance.”

Instead, the Administration has declared war on American science, canceling existing grants with glee and proposing massive cuts for medical and scientific research.

“Pursuing early and advanced science, including materials science, that is related to energy and national security.”

Energy research has been a primary target of Administration cuts.

“CEQ reforms to NEPA.” [CEQ is the White House Council on Environmental Quality]

Instead of reforming CEQ’s regulations, the Administration has abolished CEQ’s authority to issue NEPA regulation in favor of a chaotic process of agency-by-agency procedures combined with heavy reliance on the “energy emergency” as an excuse to short-circuit or eliminate NEPA review.

Why did Project 2025 fall short? Maybe the Heritage Foundation pulled some of its punches, realizing that ideas like canceling nearly completed renewable-energy projects or slashing science spending would not be popular. Alternatively, maybe the Foundation simply failed to anticipate how radical the Trump Administration would be. In retrospect, when he was dismissive of the Project 2025 report, Trump should have clarified he considered the report too moderate.