



Scott Pruitt, Administrator,
United States Environmental Protection Agency
1200 Pennsylvania Avenue N.W., Washington, DC, 20460

May 8, 2017

RE: Comment on Executive Order 13777: Enforcing the Regulatory Reform Agenda, Docket ID: EPA-HQ-OA-2017-0190: Americans want environmental protections.

Dear Administrator Pruitt:

President Trump’s Executive Order directing the EPA and other agencies to identify regulations to repeal, replace, or modify is based on a false premise—that environmental regulations burden the American people. In reality, environmental protections serve to strengthen all parts of our society, including our economy and our workforce. As a recent report by the New York University School of Law put it, cutting environmental protections for the sake of jobs is “bad economics, bad policy, and bad law.”¹

We write to ask Administrator Scott Pruitt not to cut protections based on the false narrative that regulation is bad for the economy, and instead ask the Administrator to heed the call from the large majority of Americans who wish to see the EPA *strengthen* environmental protections.

Executive Order 13777 directs the Administrator to identify regulations which eliminate jobs or “impose costs that exceed benefits.”² A good-faith, scientifically sound review of EPA regulations will reflect what the regulatory impact analyses of EPA rules show: that regulatory costs are far outweighed by benefits. Even looking at job losses alone, the authoritative studies show that regulations do not result in significant job losses, and likely create more and better jobs in the long-run. For instance, an EPA-commissioned survey of the literature shows that, at worst, most regulations are job neutral, and in many instances regulations are beneficial to job creation.³ The Office of Management and Budget has made similar findings, as have hundreds of academic researchers.⁴

More importantly, however, the regulations which the administrator would cut have gone through extensive public review, often conducted over the course of years and with input from all sectors of American life. Through this process, the EPA has produced regulations which already account for the

¹ Institute for Policy Integrity, New York University School of Law, *The Regulatory Red Herring: The Role of Job Impact Analyses in Environmental Policy Debates*. April, 2012, available at: http://policyintegrity.org/files/publications/Regulatory_Red_Herring.pdf

² Exec. Order No. 13777, (Feb. 24, 2017), at § 3 (d)(i-iii).

³ Arnold, Frank S., *Environmental Protection: is it Bad for the Economy? A Non-Technical Summary of the Literature*. Commissioned by the EPA, July 9, 1999. Available at: [https://yosemite.epa.gov/ee/epa/erm.nsf/vwAN/EE-0422-01.doc/\\$file/EE-0422-01.doc](https://yosemite.epa.gov/ee/epa/erm.nsf/vwAN/EE-0422-01.doc/$file/EE-0422-01.doc)

⁴ Office of Management and Budget, *Report to Congress on the Costs and Benefits of Federal Regulations*, September 30, 1997; see also Viscusi, W.K., *The Value of Risks to Life and Health*. *Journal of Economic Literature* 31:1912-1946, 1993.

impact on jobs and the economy, balanced with the best science available on how we can protect our health and environment. Today, however, the EPA proposes to erase years of thoughtful, common-sense, collaborative rule making after hosting only a handful of calls and meetings.

Current efforts to “streamline” EPA’s regulatory framework will wastefully gut protections representing five decades of work and significant investments of taxpayer funds. The vast majority of Americans, including many who voted for President Trump, do not support rolling back environmental protections. In fact, an overwhelming number want protections strengthened, according to recent polls.⁵

We call on the EPA and Administrator Pruitt to administer existing protections that embody the true mission of the EPA: ensuring that “all Americans are protected from significant risks to human health and the environment where they live, learn and work.”

Respectfully Submitted,

Patrick Anderson

(on behalf of Partnership for Policy Integrity)

⁵ *Unlike Trump, Majority of Americans Want Strong Environmental Regulator*. Reuters, Jan. 17, 2017. Available at: <http://www.reuters.com/article/us-usa-trump-environment-idUSKBN1511DU>.