

May 15, 2017

Dear Administrator Pruitt,

On behalf of the undersigned organizations and our millions of members and supporters, we write to express our deep concern over the Environmental Protection Agency's (EPA) recently noticed process for evaluating existing regulations that can be "repealed, replaced, or modified." See U.S. EPA, Evaluation of Existing Regulations, 82 Fed. Reg. 17,793 (Apr. 13, 2017) (Docket ID EPA-HQ-OA-2017-0190). The public process in which EPA is now engaged flows from a memo from EPA Administrator Pruitt to senior EPA leadership and Regional Administrators issued on March 24, 2017. See Memorandum from Scott Pruitt, Administrator, U.S. EPA, to select EPA staff (Mar. 24, 2017), *available at* [https://www.epa.gov/sites/production/files/2017-04/documents/regulatory\\_reform\\_agenda.pdf](https://www.epa.gov/sites/production/files/2017-04/documents/regulatory_reform_agenda.pdf).

We object to the false premise that public safeguards are holding back our nation. In reality, environmental protections have saved lives, improved health, conserved resources and spurred innovation, all while allowing for economic growth and providing far more in benefits than they cost. There is no evidence that EPA is saddling industry with numerous outmoded or unnecessary regulations. EPA should ensure that it runs an open and balanced process if it is to get a true picture of what regulations are doing for Americans and how they feel about them. It is vital that you put in place a process that provides the public with adequate notice and the ability to meaningfully comment.

We see no reason to believe that, even after the arduous process for promulgating regulations and previous retrospective reviews, EPA's current framework of protections is filled with obsolete, ineffective or counter-productive rules. Rather, this exercise is driven by an ideological opposition to all regulation, no matter how needed. Indeed, the docket's reliance on Executive Order 13771 – an order illegally focused on the costs and ignoring the benefits of regulations – betrays its intentions to create a one-way ratchet, tailored to hear from industry special interests voicing their displeasure with protections that help the broad public, instead of considering those areas where the public remains at risk and where EPA regulations are vitally needed. EPA ought to be asking for guidance on how to better carry out its mission of protecting public health, not how to retreat from it.

This single-minded (and closed-minded) focus on eliminating protections could have immense consequences on EPA's core mission to protect human health and the environment. Offices at the agency have delivered enormous benefits to the public in implementing their legal obligations – obligations that a regulatory review will not change.<sup>i</sup>

With so much at stake, it is essential that EPA provide the public with a meaningful opportunity to comment as part of this process. Yet, the agency has provided little advance notice, has indicated no interest in holding hearings outside the DC-Metro area, and has given no clear signal even as to which EPA divisions will be involved. Some offices are holding limited, invitation-only sessions, while another is only holding a teleconference in lieu of actually interacting with the public.

The fundamental rights that every American enjoys to clean air, clean water, and a healthy environment have been thrown into doubt by EPA's announcement. It is therefore vital that EPA reconsider its current process, which is substantively flawed, transparently biased, and procedurally deficient.

Sincerely,

Alabama Rivers Alliance  
Alaska Community Action on Toxics  
Alliance of Nurses for Healthy Environments  
American Sustainable Business Council  
Amigos Bravos  
Arkansas Advanced Energy Association  
Asbestos Disease Awareness Organization  
Beyond Toxics  
Breast Cancer Prevention Partners  
Cahaba River Society  
California River Watch  
Calusa Waterkeeper  
Center for American Progress  
Center for Coalfield Justice  
Center for Public Environmental Oversight  
Center for Water Advocacy  
Citizen Power  
Citizens for a Clean Pompton Lakes  
Clean Corvallis Air  
Clean Water Action  
Clean Water Action California  
Coalition for Smarter Growth  
Conservation Voters New Mexico  
Conservation Voters New Mexico Education Fund  
Earth Conservation Corps  
Earthjustice  
Earthworks  
Eastside Portland Air Coalition  
Ecology Center  
Elders Climate Action  
Endangered Habitats League  
Environment America  
Environment Arizona  
Environment California  
Environment Colorado  
Environment Connecticut  
Environment Florida  
Environment Georgia  
Environment Illinois  
Environment Iowa

Environment Maine  
Environment Maryland  
Environment Massachusetts  
Environment Michigan  
Environment Minnesota  
Environment Missouri  
Environment Montana  
Environment Nevada  
Environment New Hampshire  
Environment New Jersey  
Environment New Mexico  
Environment New York  
Environment North Carolina  
Environment Ohio  
Environment Oregon  
Environment Rhode Island  
Environment Texas  
Environment Virginia  
Environment Washington  
Environmental Defense Fund  
Environmental Working Group - EWG  
Farmington River Watershed Association  
Farmworker Association of Florida  
FreshWater Accountability Project  
Friends of Cibolo Wilderness  
Friends of the Earth  
Gasp, Inc.  
God's Country Chapter of Trout Unlimited  
Greater Edwards Aquifer Alliance  
Green America  
Green Team, Unitarian Universalist Church of Loudoun  
GreenLatinos  
Gulf Restoration Network  
HEAL Utah  
Healthy Schools Network  
Human Synergy Works  
Huron River Watershed Council  
Idaho Rivers United  
Illinois Council of Trout Unlimited  
Interfaith Power & Light  
Iowa Citizens for Community Improvement  
Kansas Alliance for Wetlands and Streams  
Kentucky Waterways Alliance  
League of Conservation Voters  
League of United Latin American Citizens  
League of Women Voters of the United States  
Massachusetts Rivers Alliance  
Midwest Environmental Justice Organization

Milwaukee Riverkeeper  
Minnesota Center for Environmental Advocacy  
Montana Environmental Information Center – MEIC  
Mountain Lakes Preservation Alliance  
NextGen Climate America  
Natural Resources Defense Council  
Northwest Atlantic Marine Alliance  
Occupational Health Clinical Centers  
Ocean Futures Society  
Ohio Environmental Council  
Oil Change International  
Oregon Environmental Council  
PennEnvironment  
Powder River Basin Resource Council  
Power Shift Network  
Prairie Rivers Network  
Progress For All  
River Network  
San Juan Citizens Alliance  
Sierra Club  
South Portland Air Quality  
Southern Environmental Law Center  
Southwings  
STIR, Save The Illinois River  
Sugar Law Center  
Surfrider Foundation  
Texas Campaign for the Environment  
The Dalles Air Coalition  
The North Shore Waterfront Conservancy of Staten Island  
To Nizhoni Ani  
Union of Concerned Scientists  
United Sludge Free Alliance  
Unity with Nature committee, Baltimore Yearly Meeting of the Religious Society of Friends  
Washington Conservation Voters  
Washington Environmental Council  
WE ACT for Environmental Justice  
Wisconsin Environment  
Yukon River Inter-Tribal Watershed Council

---

<sup>i</sup> The Office of Air and Radiation administers laws, including the Clean Air Act and Atomic Energy Act, designed to limit air pollution, stratospheric ozone depletion, climate change, acid rain and radon exposure, among others. This protects public health, helping prevent asthma attacks, birth defects, respiratory and cardiovascular disease and cancer. The Clean Air Act alone has saved millions of lives and more than \$30 trillion in avoided healthcare costs over the course of its implementation.

The Office of Water administers laws, including the Clean Water Act and Safe Drinking Water Act, designed to limit contaminants in drinking water and protecting our streams and wetlands. Benefits include reducing flood risks, a critical issue for the approximately \$360 billion dollars-worth of properties, including 9.6 million homes, in flood-prone areas.

EPA's Environmental Justice programs and the Office of Environmental Justice help the federal government engage communities, work with sovereign tribes, and ensure that enforcement is not neglected where it is needed most – low-income areas and communities of color that are disproportionately on the frontlines of injustices like polluted air and unsafe water.

The Office of Land and Emergency Management is charged with responding to emergencies, such as the West Texas chemical plant explosion. It also develops and implements safeguards to prevent such emergencies from happening in the first place.

The Office of Chemical Safety and Pollution Prevention implements the Toxic Substances Control Act, the Federal Insecticide, Fungicide, and Rodenticide Act, and other laws to protect people from unhealthful exposure to chemicals. These laws are meant to prevent the use of the riskiest and most dangerous toxic chemicals, whether they are on or in our food, in our drinking water, or used on products in our homes and workplaces. The Office also manages the annual publication of the Toxics Release Inventory. This database, created by the Emergency Planning and Community Right to Know Act, empowers citizens to learn about toxic releases in their communities and has led to the largest voluntary reduction of toxic discharges of any voluntary program.