

April 25, 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the Environmental Protection Agency's (EPA) recently noticed process for evaluating existing regulations that can be "repealed, replaced, or modified."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.

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.ⁱ

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
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
Massachusetts Rivers Alliance
Midwest Environmental Justice Organization
Milwaukee Riverkeeper
Montana Environmental Information Center - MEIC

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
Southern Environmental Law Center
STIR, Save The Illinois River
Sugar Law Center
Surfrider Foundation
Texas Campaign for the Environment
The Dalles Air Coalition
To Nizhoni Ani
Union of Concerned Scientists
United Sludge Free Alliance
Washington Conservation Voters
Washington Environmental Council
WE ACT for Environmental Justice
Wisconsin Environment
Yukon River Inter-Tribal Watershed Council

ⁱ 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.