



## Project 2025: Eviscerating environmental protections

Project 2025 is a 900-page blueprint for implementing an extreme-right policy agenda across various agencies, with widespread implications for democracy, health care, education and more. On environmental matters, it calls for eliminating or stripping funding from environmental agencies and programs, weakening environmental and public health regulations, and adopting a host of anti-climate measures.

Underpinning all of these policy and regulatory proposals is a dramatic effort to remake federal agencies by authorizing the President to convert around 50,000 federal government jobs from career positions to politically-appointed ones. Through "Schedule F," the President could purge agencies of experienced, expert staff and replace them with short-term political loyalists.

The federal government is still recovering after thousands of experienced career staff were hemorrhaged during the Trump Administration. For example, after the Department of Interior announced in 2019 to move its headquarters from Washington DC [only 23 percent of staff](#) accepted the reassignments and stayed on. At the Environmental Protection Agency, politically-related pressure made it untenable for many staff to do their jobs. A recent EPA Inspector General report found that the agency had pressured scientists to downplay the health risks of certain chemicals, and [retaliated against them](#) through performance evaluations and job reassignments.

The plan to use Schedule F to replace civil servants with political loyalists is just one way that Project 2025 seeks to consolidate power behind the presidency. The plan envisions fundamentally altering the balance of power at the federal level, giving the Executive Branch more force, with fewer checks, to prevent a descent into authoritarianism. Other measures include requiring independent agencies to submit their policies for review to the White House Office of Information and Regulatory Affairs<sup>ii</sup> and bypassing the Senate confirmation process by placing "its nominees for key positions into similar positions as 'actings,'" while removing some positions from Senate confirmation altogether.<sup>iii</sup>

Finally, although Project 2025 is best known for its detailed right-wing policy prescriptions, its proponents are also compiling a [Presidential Personnel Database](#) of potential staff, along with a [training program](#) for providing "aspiring appointees with the insight, background knowledge, and expertise in governance to immediately begin rolling back destructive policy and advancing conservative ideas in the federal government."<sup>iv</sup> This training not only provides an orientation to how government works, but it also promises to help with "recognizing and addressing the dangers of the administrative state." In addition, Project 2025 includes a 180-day quick-start plan for every major government agency to rapidly implement changes.<sup>v</sup>

The following is a summary of some of the anti-environmental proposals envisioned in Project 2025.

### Attacks on bedrock environmental laws

Project 2025 would have devastating consequences for our bedrock environmental laws such as the National Environmental Policy Act, Endangered Species Act, Clean Air Act and the Migratory Bird Treaty Act.

### *National Environmental Policy Act*

Proposals to weaken NEPA are distributed throughout many chapters of the 900-page document. NEPA has long been in conservatives' crosshairs; most recently it has been a central element of bipartisan efforts involving "permitting reform."

- In 2020, Trump acted to [dramatically weaken NEPA](#); these rollbacks were successfully restored under the Biden administration in 2022. Project 2025 proposes to reinstate Trump's regulatory rollbacks and even more aggressively gut NEPA in a variety of ways, including by<sup>vi</sup>:
  - o Banning cumulative impact analysis
  - o Limiting judicial review, which has been a key way to ensure that NEPA is properly implemented.
  - o Instituting sweeping changes to permitting system across all agencies.
  - o Reducing litigation risk.
  - o Introducing more general, streamlined permits.
- Within the Department of Energy, Project 2025 proposes:
  - o Applying NEPA Categorical Exclusions for Liquid Natural Gas exports.<sup>vii</sup>
  - o Applying NEPA analysis for pipelines only to direct impacts, rather than including indirect or downstream impacts.<sup>viii</sup>
- Within the Environmental Protection Agency
  - o Limiting EPA's involvement in NEPA as it relates to other agencies' implementation of the law.<sup>ix</sup>
- Within the Department of Commerce
  - o Exempting fisheries actions from NEPA.<sup>x</sup>

### *Endangered Species Act*

The Endangered Species Act is one of the US' most successful environmental laws, with a [99 percent success rate](#) in ensuring that listed species do not go extinct. Project 2025 takes aim at ESA because it has been successfully used to protect endangered species habitat, which sometimes means preventing resource extraction, agriculture, polluting activities and industrial development that would severely impair those habitats.

The document calls out particular species, such as the greater sage grouse, whose protection has thwarted fossil fuel extraction. It also seeks to ensure that implementation of ESA is put in the hands of states, an attempt to reduce the jurisdiction US Fish and Wildlife Service in favor of pro-drilling Western states.<sup>xi</sup>

- The Fish and Wildlife Service plays a key role in implementing the ESA, including listing and delisting species, designating critical habitat and developing recovery plans. Project 2025 proposes<sup>xii</sup>:
  - o Delisting specific species, including Yellowstone grizzly bears and greater sage grouse. Protections for these species have prevented the fossil fuel industry from drilling.

- Abolishing species specialists.
- Within the Agriculture Department, embracing and expanding a Trump Executive Order to massively expand timber sales, by “reducing regulatory obstacles” posed by the ESA.<sup>xiii</sup>
- Within the Department of Interior, rescinding Biden rules and reinstating Trump rules on ESA’s definition of critical habitat and exclusions.<sup>xiv</sup>
- Within the Commerce Department, modifying regulations to implement ESA, which are being “abused” at the cost of fisheries.<sup>xv</sup>
- Changing the Endangered Species Act so it allows agencies to account for the “beneficial effects of pesticides.”<sup>xvi</sup>

### **Environmental Protection Agency**

[According to](#) former Acting Deputy EPA Administrator Stan Meiburg, “Project 2025 is just full of recommendations that would essentially eviscerate EPA. They would turn it into a shell of what its true mission is.” Meiburg is now on the Board of Environmental Protection Network, a group of 650 former EPA employees who left the agency during the Trump Administration.

In addition to shrinking the agency itself, Project 2025 also seeks to reduce the power of EPA vis-à-vis other federal agencies. EPA has often acted as the standard bearer for NEPA when coordinating with other agencies that also have a duty to uphold the law. Project 2025 aims to speed up approvals and permit for fossil fuel projects, for example, by reducing EPA’s influence in interagency processes.<sup>xvii</sup>

The document also proposes:

- Eliminating multiple EPA offices, including the Office of Public Engagement of Environmental Affairs, Office of Environmental Justice and External Civil Rights, and Office of Enforcement and Compliance Assistance.<sup>xviii</sup>
- Reviewing -- with the eye towards curbing -- EPA’s use of Environmental Justice and Title VI (under the Civil Rights Act) authority.<sup>xix</sup>
- Issuing rules to revamp cost-benefit analyses in ways that make it more difficult to issue new environmental regulations.<sup>xx</sup>
- Ensuring that EPA decision-making on chemicals does not incorporate the precautionary principles.<sup>xxi</sup> This is a direct rejection of the approach taken by the European Union through its REACH chemical standards, which advocates hold up as model.
- Having EPA backtrack on its decision to designate PFAS chemicals (“forever chemicals” linked to cancer, reproductive harm, birth defects, etc.) as a hazardous substance,<sup>xxii</sup> which empowers the agency to order polluters to pay for clean-up.
- Speeding up approvals for new chemicals.<sup>xxiii</sup>
- Installing Science Advisors with fewer scientific qualifications.<sup>xxiv</sup>

### **Drill, Baby Drill**

Project 2025 proposes a range of specific rollbacks to accelerate fossil fuel production, with the goal of “unleashing all of America’s energy resources.”<sup>xxv</sup> Public drilling on federal lands would be boosted, fossil fuel infrastructure projects would be streamlined, while renewable energy investments would be curbed. It also calls for expedited approval of license extensions for ageing nuclear power plants,<sup>xxvi</sup> which would push most of them beyond their design lifetimes.

The document seeks to dismantle some of the strategies for limiting fossil fuel extraction, including eliminating the Antiquities Act,<sup>xxvii</sup> which empowers the federal government to expand or designate new national monuments. In the past few years, the creation of new monuments in the West have resulted

in new environmental protections that bar natural gas drilling and other types of resource extraction in and around Monuments.

Proposals to increase fossil fuels include:

- Reinstating quarterly onshore lease sales in all producing states.<sup>xxviii</sup>
- Holding offshore oil and natural gas lease sales to the maximum extent permitted.<sup>xxix</sup>
- Capping rents, royalty rates, and bonding requirements to what is required under the Inflation Reduction Act, and no more.<sup>xxx</sup>
- Conducting oil and gas leasing and development in Alaska's Coastal Plain.<sup>xxxi</sup>
- Finishing the programmatic environmental review of the federal coal leasing program, and lifting the Obama-era moratorium on coal leasing from public lands.<sup>xxxii</sup> (A US circuit court struck down this moratorium in February 2024, but the BLM later decided to stop leasing coal in the Powder River basin, which produces over 40 percent of the coal in the US).
- Reversing lands that were protected from leasing, including the buffer zones that were created to protect the White River National Forest and Chaco Cultural Historic National Park.<sup>xxxiii</sup>
- Implementing a suite of plans to increase commercial resource extraction in Alaska, including opening up most of the Alaska Petroleum Reserve,<sup>xxxiv</sup> re-starting leases that had been suspended due to NEPA, approving the Willow EIS and the Ambler Road projects, and reopening 9 million acres of the Tongass National Forest to roadbuilding and logging.<sup>xxxv</sup>
- Exempting LNG exports from NEPA<sup>xxxvi</sup> and eliminating "political and climate-change interference in DOE approvals of liquefied natural gas (LNG) exports."<sup>xxxvii</sup> Currently, DOE is contemplating a process that could result in tough new standards that allow pending export terminals to be rejected on climate and justice grounds.

### Curbing climate action

While the Biden administration took a "whole of government" approach to climate change, embedding climate into agency activities, Project 2025 systematically strips it out. According to an analysis by [Energy Innovation](#), it would result in 26 billion tons more emissions by 2050 and cause almost 5,000 more premature deaths due to air pollution (compared to 20,000 fewer if the US hits our Paris Climate Agreement targets).

The plan takes clear aim at some of the most effective strategies to address climate change and curb fossil fuels. Notably, it seeks to reverse the EPA's "endangerment finding" for greenhouse gases.<sup>xxxviii</sup> When the agency determined in 2009 that GHGs endangered public health and welfare, this empowered the EPA and other agencies under the Clean Air Act to regulate GHGs by promulgating rules such as power plant regulations. Reversing the endangerment finding would undermine the very power of agencies to limit GHGs under this law.

In addition, the document also aims to stymie California's national leadership on climate change. For decades, EPA has issued a [waiver](#) for California, allowing the state to issue air regulations exceeding federal standards, notably for motor vehicles. Because California is the world's sixth largest economy, automobile manufacturers have reduced their national fleet's emissions, making California's clean cars law a *de facto* national standard. For many years, the California waiver has allowed the US to make climate progress even through federal administrations that were hostile to climate change. Project 2025 aims to rescind this waiver for greenhouse gases.<sup>xxxix</sup>

Other anti-climate proposals include:

- Pulling out of the Paris Climate agreement as well as the UN Framework Convention on Climate Change.<sup>xi</sup>
- Making “deep cuts”<sup>xli</sup> and “rescinding” climate policies from all foreign aid,<sup>xlii</sup> including cutting climate finance (the money the US owes to developing countries to adapt to and mitigate climate change, and to cope with the loss and damage created by climate change).
- Repealing the Inflation Reduction Act,<sup>xliii</sup> including rescinding the electric vehicle mandates and subsidies.<sup>xliiv</sup>
- Reducing the sectors required to report on greenhouse gas emissions.<sup>xliiv</sup>
- Stopping EPA from assessing the social cost of carbon,<sup>xlivi</sup> which quantifies the co-benefits of curbing greenhouse gas emissions like improved air quality.
- Eliminating the National Oceanic and Atmospheric Administration,<sup>xlvii</sup> which it deems “one of the main drivers of the climate change alarm industry.”<sup>xlviii</sup>
- Cutting the White House Office of Domestic Climate Policy,<sup>xlix</sup> the Treasury Department’s Climate Hub<sup>l</sup> and Department of Energy’s Office of Energy Efficiency and Renewable Energy<sup>li</sup> and Clean Energy Corps program.<sup>lii</sup>
- Marginalizing climate science at the National Labs<sup>liii</sup> and sidelining the U.S. Global Change Research Program, which produces the National Climate Assessment.<sup>liv</sup>
- Eliminating energy efficiency standards for household appliances.<sup>lv</sup>
- Severely limiting FEMA funding, shifting the responsibility of disaster relief to states.<sup>lvi</sup>
- Cutting climate-related HUD programs<sup>lvii</sup> which help low- and moderate-income communities become more energy efficient, recover from hurricanes and wildfires, and protect against future disasters.

### **Food and agriculture**

Project 2025 proposes significant changes to food and agriculture policies and programs, such as:

- Eliminating the USDA’s Conservation Reserve Program,<sup>lviii</sup> a program that incentivizes farmers to convert environmentally sensitive land to native grasses, trees and riparian buffers.
- Removing federal inspection requirements for meat and poultry processing, leaving facility inspection to states only.<sup>lix</sup>
- Adopting a suite of proposals to promote biotechnology in agriculture (which is already under-regulated) , including the federal labeling law on genetically modified organisms.<sup>lx</sup>
- Weakening the application of the Endangered Species Act and reducing the influence of EPA science when it comes to the approval of pesticides.<sup>lxi</sup>
- Undermining or even eliminating the science-backed Dietary Guidelines for Americans, claiming that “climate change and sustainability [have] infiltrated the process.”<sup>lxii</sup>
- Dramatically decreasing federal food assistance through SNAP.<sup>lxiii</sup>
- Reversing the positive trend towards universal school feeding programs.<sup>lxiv</sup>

### **Climate-related financial Regulations**

Recently, the Securities and Exchange Commission issued a rule requiring large publicly traded companies to disclose their Scope 1 & 2 greenhouse gas emissions (emissions from a company’s activity, and also from its energy use). Although this rule was significantly weakened due to political pressure and litigation, Project 2025 nonetheless calls for Congress to:<sup>lxv</sup>

- Prohibit the SEC from requiring publicly traded companies to disclose social, ideological, political, or “human capital” information that is not material to investors’ financial, economic, or pecuniary risks or returns.

- Repeal the Dodd–Frank mandated disclosures relating to conflict minerals, mine safety, resource extraction, and CEO pay ratios.

In addition, the report takes aim at the trend in socially responsible investing, or ESG (environmental, social and governance) investing, which has grown over the last 30 years. Spurred by the notable momentum of the fossil fuel divestment movement, and the popularity of diversity initiatives in Corporate America, Project 2025 has brought “anti-wokeism” culture wars into the finance realm by proposing to:<sup>lxvi</sup>

- Preventing employer-sponsored worker retirement plans under the Employee Retirement Income Security Act from considering ESG factors.
- Making it harder for federal government employees to access ESG investment options.
- Dropping contracts with asset managers like BlackRock and State Street Global Advisers, two fund managers that recently made commitments to take climate change into consideration in investments.

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<sup>i</sup> The Heritage Foundation. 2024. *Mandate For Leadership: The Conservative Promise 2025*. Washington, D.C.: The Heritage Foundation, p 32, 80-1, 524, 535.

<sup>ii</sup> *Ibid*, p 49.

<sup>iii</sup> *Ibid*, p 136.

<sup>iv</sup> <https://www.project2025.org/training/presidential-administration-academy/>

<sup>v</sup> <https://www.project2025.org/playbook/>

<sup>vi</sup> The Heritage Foundation. 2024. *Mandate For Leadership: The Conservative Promise 2025*. Washington, D.C.: The Heritage Foundation, p 60.

<sup>vii</sup> *Ibid*, p 377.

<sup>viii</sup> *Ibid*, p 407.

<sup>ix</sup> *Ibid*, p 441.

<sup>x</sup> *Ibid*, p 676.

<sup>xi</sup> *Ibid*, p 534.

<sup>xii</sup> *Ibid*, p 534.

<sup>xiii</sup> *Ibid*, p 308.

<sup>xiv</sup> *Ibid*, p 522.

<sup>xv</sup> *Ibid*, p 676.

<sup>xvi</sup> *Ibid*, p 435.

<sup>xvii</sup> *Ibid*, p 441.

<sup>xviii</sup> *Ibid*, p 421.

<sup>xix</sup> *Ibid*, p 441.

<sup>xx</sup> *Ibid*, p 423.

<sup>xxi</sup> *Ibid* pp 433

<sup>xxii</sup> *Ibid*, p 431.

<sup>xxiii</sup> *Ibid*, p 434.

<sup>xxiv</sup> *Ibid*, p 436.

<sup>xxv</sup> *Ibid*, p 286, 384.

<sup>xxvi</sup> *Ibid*, p 409.

<sup>xxvii</sup> *Ibid*, p 532.

<sup>xxviii</sup> *Ibid*, p 522.

<sup>xxix</sup> *Ibid*, p 523.

<sup>xxx</sup> *Ibid*

<sup>xxxi</sup> *Ibid*

<sup>xxxii</sup> *Ibid*

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xxxiii *Ibid*  
xxxiv *Ibid*  
xxxv *Ibid*, p 530-1.  
xxxvi *Ibid*, p 377, 408.  
xxxvii *Ibid*, p 369.  
xxxviii *Ibid*, p 425  
xxxix *Ibid*, p 426.  
xl *Ibid*, p 709.  
xli *Ibid*, p 254.  
xlii *Ibid*, p 257.  
xliii *Ibid*, p 365.  
xliv *Ibid*, p 537.  
xlv *Ibid*, p 425.  
xlvi *Ibid*, p 436.  
xlvii *Ibid*, p 664.  
xlviii *Ibid*, p 675.  
xlix *Ibid*, p 61.  
l *Ibid*, p 709.  
li *Ibid*, p 379.  
lii *Ibid*, p 386.  
liii *Ibid*, p 365.  
liv *Ibid*, p 59.  
lv *Ibid*, p 378.  
lvi *Ibid*, p 135.  
lvii *Ibid*, p 508.  
lviii *Ibid*, p 304.  
lix *Ibid*, p 305.  
lx *Ibid*, p 307.  
lxi *Ibid*, p 435.  
lxii *Ibid*, p 309.  
lxiii *Ibid*, p 299.  
lxiv *Ibid*, p 303.  
lxv *Ibid*, p 832.  
lxvi *Ibid*, p 606-8.