

Trump Delivers For Fossil Fuel Special Interests

Trump gave the fossil fuel industry nearly everything they asked for. Now where are those 25 million new jobs he promised the American people?

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TL/DR

Trump has failed to deliver on his promise to create 25 million jobs for American workers:

- Upon inauguration, Trump [promised](#) to create 25 million jobs over ten years. In reality, the U.S. economy has lost almost [7.9 million jobs](#) since Trump took office, and over [14.4 million jobs](#) were have been lost since January 2020.

- Trump can't blame the pandemic for his failure to live up to his bold jobs promises. Even before the pandemic hit (and Trump failed to respond to it), job creation in Trump's first three years [was less](#) than the preceding three years under Obama and far behind the pace needed to meet his [campaign promise of 25 million new jobs](#).
- Between Trump's mishandling of the pandemic and his attacks on renewable energy policies, Trump has cost the country more than 1.1 million renewable energy jobs. [See our previous research on clean energy jobs here](#).
- [Check out our research below](#) for state-specific job statistics.

While Trump has failed on his promise to deliver jobs, he has given fossil fuel CEO buddies nearly everything they've asked for:

Robert Murray's now-bankrupt coal company Murray Energy secured a wish list of 16 regulatory rollbacks for the oil and gas industry:

- In March of 2017, Murray Energy President Robert Murray sent Trump's administration an ['action plan' document](#) of 16 environmental rollbacks. By Murray's own account, Trump had "wiped out page one" of the [three-page wish list](#) by October 2017.
- Murray Energy [called for eliminating](#) the Obama-era Clean Power Plan and for withdrawing the 'endangerment finding' for greenhouse gases under the Clean Air Act. In March 2017, Trump [issued](#) an executive order setting in motion the Clean Power Plan's repeal. In June 2019, the Trump administration [completed](#) its rollback of the Clean Power Plan, [replacing it](#) with the Affordable Clean Energy rule as a means to [circumvent](#) the legal obstacles to repealing the endangerment finding.
- Murray Energy [called for eliminating](#) wind and solar production tax credits. In 2019, the Trump administration [killed](#) the solar investment tax credit, leaving the wind tax credits intact.
- Murray Energy [called for](#) the United States' withdrawal from the Paris Climate Accord. In November 2019, Trump [notified](#) the U.N. that the U.S. was withdrawing from the landmark climate agreement.
- Murray Energy [called for ending](#) the electric utility maximum achievable technology and ozone regulations. Trump's EPA [undermined](#) the legal basis for the mercury and air toxics standards by ignoring the benefits of protecting people from other pollutants. In June 2017, the EPA

[announced](#) it would delay implementation of stricter regulations on ozone pollution. Following legal action, the EPA [reversed](#) its delay on implementing the Obama-era ozone regulations

- Murray Energy [called for](#) funding the development of 'clean coal' technologies. In February 2018, Trump [signed](#) tax credits for carbon capture into law and [proposed](#) restoring funding for 'clean coal' efforts.
- Murray Energy [called for](#) an overhaul of the Department of Labor's Mine Safety and Health Administration. Under Trump, MSHA sought to [roll back](#) workplace inspection protections for miners. A federal appeals court [struck down](#) Trump's re-write of mine-safety regulations in June 2019, and in September 2018 a former member of the Federal Mine Safety And Health Review Commission [accused](#) Trump's Department of Labor of undermining protections for miners.
- Murray Energy [called for cutting](#) the EPA's staff in at least half. During the first 18 months of the Trump administration, the EPA's workforce [shrank](#) by 8 percent.
- Murray Energy [called for overturning](#) the cross-state Air Pollution rule under the Clean Air Act. In December 2018, the EPA [issued](#) a final rule rejecting an Obama-era update to the so-called "Good Neighbor Provision," and in September 2019, a federal court [ruled](#) the EPA's rule was inconsistent with the Clean Air Act.
- Murray Energy [called for revising](#) the Coal Mine Dust Regulation. In the Fall of 2017, the Trump administration [announced](#) it would review the rule, and in 2019, the notice and comment period for the proposed revisions was [extended](#) until July 2022.
- Murray Energy [called for funding](#) retiree medical care and pensions for America's United Mine Workers of America (UMWA) retired coal miners. In December 2019, Congress [passed legislation](#) to fund pensions for retired miners.
- Murray Energy [called for overturning](#) the 'Pattern of Violations' rule for mines. Trump's MSHA [sought to undercut](#) enforcement of the rule, pushed by the Agency's head, former coal mine executive David Zatezalo. Bob Murray personally [pushed for](#) Zatezalo's appointment to lead MSHA.
- Murray Energy [called for](#) Trump to appoint industry-friendly judges to the U.S. Supreme Court. Justice Brett Kavanaugh has been [praised](#) by

the oil and gas industry for his record on energy and environmental cases, having voiced his opposition to the Clean Power Plan and dissented in decisions to uphold EPA actions under the Clean Air Act. Justice Neil Gorsuch likewise has been critical of EPA actions, [arguing against](#) giving agency's leeway to interpret vague legal statues as [established](#) in the landmark Chevron v. NRDC 1984 Supreme Court case.

- Murray Energy [called for replacing](#) members of numerous oversight boards, including the Federal Energy Regulatory Commission (FERC), the Tennessee Valley Authority (TVA) Board of Directors, and the National Labor Relations Board (NLRB.) Trump has [nominated](#) a Republican to one of two FERC vacancies, as opposed to the traditional practice of nominating one member from each party, has [appointed](#) four members to the TVA Board of Directors, and the NRLB is now [entirely comprised](#) of Republican members.

The American Petroleum Institute outlined a litany of pro-polluter actions, and Trump delivered:

- In a May 2017 document from the API, the group noted it had [called for revising](#) emissions standards at new, reconstructed and modified drilling sites. In April 2017, the EPA [ordered a review](#) of rule limiting methane emissions at new oil and gas drilling sites. In December 2018, the EPA [proposed](#) a revision of greenhouse gas emission standards for new, modified, and reconstructed sources.
- The API [called for revising](#) Accidental Release Prevention regulations under the Clean Air Act. In January 2017, the EPA [amended](#) the Accidental Release Prevention requirements, which were set to be implemented that March. The Trump administration sought to [delay implementation](#) of the new regulations until February 2019. Following [legal action](#) from states and environmental groups, the EPA [published](#) a final rule revising accidental release prevention regulations in December 2019.
- The API [called for reversing](#) Startup, Shutdown, Malfunction (SSM) exemption to State Implementation Plans under the Clean Air Act. In 2017, the Trump administration [sought to re-open](#) SSM exemptions, and in June 2019, the EPA [sought to reverse](#) an Obama-era action requiring North Carolina to eliminate SSM exemptions from the state's Implementation Plan.

- The API [called for reviewing](#) National Ambient Air Quality Standards (NAAQS.) In June 2017, the EPA [delayed](#) state deadlines for NAAQS, and in April 2018, Trump [issued a Presidential Memorandum](#) ordering the EPA to make sweeping changes to implementation of NAAQS.
 - The API [called for “maximum flexibility”](#) in implementation of NAAQS ozone standards. In June 2017, EPA Administrator Scott Pruitt [established](#) “an ozone cooperative compliance task force to develop additional flexibilities for states,” and in August 2017, the EPA [fought](#) 'speculative' bid to vacate ozone NAAQS designations delay.
- The API [called for revising](#) the Renewable Fuel Standard Program. In December 2019, the EPA [finalized](#) rules that increased biofuels volumes under the Renewable Fuel Standard Program.
- The API [called for reviewing](#) the 2015 Refinery Sector Risk and Technology Rule. In April 2018, the EPA [published revisions](#) to the refinery rule to address a 2016 petition from the API. In November 2018, the EPA [published](#) a final rule amending the 2015 Petroleum Refinery Regulations.
- The API [called for repealing](#) the 2015 Waters of the U.S. Rule. In January 2020, The Trump administration [finalized](#) its rollback of the Waters of the U.S. Rule.

Koch-funded climate denier Myron Ebell led trump's EPA transition team and secured major rollbacks of climate policies.

- Before being tapped to lead Trump's transition team. Myron Ebell was in charge of environmental and energy policy at the Competitive Enterprise Institute, which has reportedly received over [\\$1 million in funding](#) from groups tied to the Koch brothers.
- See our [previous research](#) on Myron Ebell and the Competitive Enterprise Institute's role in spreading anti-science misinformation on both climate change and COVID-19.
- Myron Ebell was behind a [secretive action plan](#) that [recommended rolling back](#) six Obama-era climate change executive orders. The list was never made public, but CNN [reported by June of 2017](#) that Trump had already delivered on rescinding all six Obama policies.

- Ebell [called for a withdrawal](#) from the Paris Climate Accord, a process which Trump [began in 2017](#), leading up to [serving official notice](#) to the international community in 2019
- Ebell laid out a strategy for rescinding the Clean Power Plan, which Trump [delivered in 2019](#).
- Ebell [called for cuts](#) to the size of the EPA staff. Despite Congress maintaining the agency's budget, by September of 2018, the [Washington Post reported](#) that slowed hiring had resulted in an 8 percent reduction in EPA's workforce.
- Ebell [called for serious restrictions](#) on how the EPA uses scientific research, which Trump [delivered in 2020](#).

Koch family's network of climate-denying think tanks, grassroots groups, and lobbyists lobbied for and received sweeping changes to climate and clean air and water regulations.

- The Koch network [lobbied](#) for several rules regulating the dumping of fossil fuel waste in U.S. waterways to be eliminated. Trump delivered, [allowing](#) coal companies to “dump mining waste into streams and waterways” as one of his first acts in Congress, and [eliminating](#) the Obama's Waters of the U.S. rule in January 2020.
- The Koch network [lobbied](#) for elimination of the Clean Power Plan. In March 2017, Trump [issued](#) an executive order setting in motion the Clean Power Plan's repeal. In June 2019, the Trump administration [completed](#) its rollback of the Clean Power Plan, [replacing it](#) with the Affordable Clean Energy rule as a means to [circumvent](#) the legal obstacles to repealing the endangerment finding.
- The Koch network [lobbied](#) for withdrawal from the Paris Climate Accord, a process which Trump [began in 2017](#), leading up to [serving official notice](#) to the international community in 2019
- The Koch Network [lobbied](#) the EPA to stop settling environmental lawsuits, a position a complaint which the Harvard Environmental Law Review [called](#) “mistaken”, and even the libertarian Niskanen Center [labeled](#) “nonsensical.” Trump's EPA nevertheless [announced](#) it would curb settlements in October 2017.
- The Koch network [lobbied](#) for “streamlining” the environmental review process for infrastructure projects such as oil pipelines. In 2017, Trump

announced he was significantly [cutting back the rigor](#) of the review process for these projects, and in July 2020 he revealed details of his plan to [gut NEPA](#), the nation's bedrock environmental law.

- The Koch network lobbied for gutting our national monuments, which Trump conducted a [formal review](#) on in April 2017, and ended that year by [gutting](#) Bear's Ears by 85% and Grand Staircase Escalante by half. Internal emails later [revealed](#) these reductions were explicitly made with the development of fossil fuel and uranium mines in mind.
- The Koch network [lobbied](#) for fracking on public and indigenous lands, which Trump [pushed through](#) on the last business day of 2017.
- The Koch network [lobbied](#) for allowing construction on the Keystone XL and Dakota Access pipelines, which Trump [moved](#) to re-open and allow, respectively in his first week in office in 2017.

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HERE'S WHAT'S HAPPENING

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While he's flunked on job creation, Trump has handed the oil and gas industry their wish list of regulatory rollbacks and pro-polluter policies.

Murray Energy

Trump buddy Robert Murray's now-bankrupt coal company Murray Energy secured a wish list of 16 regulatory rollbacks for the oil and gas industry. In March of 2017, Murray Energy President Robert Murray sent Trump an ['action plan' document](#) of 16 environmental rollbacks. By Murray's own account, Trump had "wiped out page one" of the [three-page wish list](#) some ten months into the job.

Trump [delivered](#) in [rolling back](#) the Clean Power Plan, [replacing it](#) with the Affordable Clean Energy rule as a means to [circumvent](#) the legal obstacles to repealing the endangerment finding (which Murray Energy also sought to reverse.) Following Murray Energy's [calls for eliminating](#) wind and solar production tax credits, in 2019 the Trump administration [killed](#) the solar investment tax credit.

Following the company's [calls for](#) the United States' withdrawal from the Paris Climate Accord, in November 2019 Trump [notified](#) the U.N. that the U.S. was withdrawing from the landmark climate agreement. Murray Energy [called for ending](#) the electric utility maximum achievable technology and ozone regulations. Trump's EPA went on to [undermine](#) the legal basis for the mercury and air toxics standards by ignoring the benefits of protecting

people from other pollutants. In June 2017, the EPA [announced](#) it would delay implementation of stricter regulations on ozone pollution.

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Murray Energy [called for](#) Trump to appoint industry-friendly judges to the U.S. Supreme Court. Justice Brett Kavanaugh has been [praised](#) by the oil and gas industry for his record on energy and environmental cases, having voiced his opposition to the Clean Power Plan and dissented in decisions to uphold EPA actions under the Clean Air Act. Justice Neil Gorsuch likewise

has been critical of EPA actions, [arguing against](#) giving agency's leeway to interpret vague legal statues as [established](#) in the landmark Chevron v. NRDC 1984 Supreme Court case.

Murray Energy [called for replacing](#) members of numerous oversight boards, including the Federal Energy Regulatory Commission (FERC), the Tennessee Valley Authority (TVA) Board of Directors, and the National Labor Relations Board (NLRB.) Trump has [nominated](#) a Republican to one of two FERC vacancies, as opposed to the traditional practice of nominating one member from each party, has [appointed](#) four members to the TVA Board of Directors, and the NRLB is now [entirely comprised](#) of Republican members.

American Petroleum Institute

In a May 2017 document, the American Petroleum Institute (API) [outlined](#) regulatory and legislative achievements from the first few months of the Trump administration.

Following the API's calls [for revising](#) emissions standards at new, reconstructed and modified drilling sites, In April 2017 the EPA [ordered a review](#) of rule limiting methane emissions at new oil and gas drilling sites. In December 2018, the EPA [proposed](#) a revision of greenhouse gas emission standards for new, modified, and reconstructed sources.

The API also [called for revising](#) Accidental Release Prevention regulations under the Clean Air Act, and in January 2017, the EPA [amended](#) the Accidental Release Prevention requirements, which were set to be implemented that March. The Trump administration sought to [delay implementation](#) of the new regulations until February 2019. Following [legal action](#) from states and environmental groups, the EPA [published](#) a final rule revising accidental release prevention regulations in December 2019.

The API [called for reversing](#) Startup, Shutdown, Malfunction (SSM) exemption to State Implementation Plans under the Clean Air Act. In 2017, the Trump administration [sought to re-open](#) SSM exemptions, and in June 2019, the EPA [sought to reverse](#) an Obama-era action requiring North Carolina to eliminate SSM exemptions from the state's Implementation Plan.

The API [called for a review of](#) National Ambient Air Quality Standards (NAAQS.) In June 2017, the EPA [delayed](#) state deadlines for NAAQS, and in April 2018, Trump [issued a Presidential Memorandum](#) ordering the EPA to make sweeping changes to implementation of NAAQS. The group also [called for "maximum flexibility"](#) in implementation of NAAQS ozone standards. In June 2017, EPA Administrator Scott Pruitt [established](#) "an ozone cooperative compliance task force to develop additional flexibilities for

states,” and in August 2017, the EPA [fought](#) 'speculative' bid to vacate ozone NAAQS designations delay.

The API [called for revising](#) the Renewable Fuel Standard Program, and in December 2019 the EPA [finalized](#) rules that increased biofuels volumes under the Renewable Fuel Standard Program.

API [called for reviewing](#) the 2015 Refinery Sector Risk and Technology Rule, and in April 2018, the EPA [published revisions](#) to the refinery rule to address a 2016 legal petition from the API. In November 2018, the EPA [published](#) a final rule amending the 2015 Petroleum Refinery Regulations.

Lastly, the API [called for repealing](#) the 2015 Waters of the U.S. Rule, which the Trump administration [finalized](#) in January 2020.

Myron Ebell

A major source of influence on Trump's anti-environment agenda that many people might not have heard of is Myron Ebell. Before being tapped to lead Trump's transition team. Myron Ebell was in charge of environmental and energy policy at the Competitive Enterprise Institute, which has received over [\\$1 million in funding](#) from groups tied to the Koch brothers.

In [previous research](#) from Climate Power 2020, we showed that Myron Ebell and the Competitive Enterprise Institute have been attacking science both on COVID-19 and climate change.

At the start of the Trump administration, Myron Ebell was behind a [secretive action plan](#) that [recommended rolling back](#) six Obama-era climate change executive orders. The list was never made public, but CNN [reported by June of 2017](#) that Trump had already delivered on rescinding all six Obama policies.

Myron Ebell's early influence during the transition period continued to have a lasting effect on policies throughout Trump's term. Ebell laid out strategies for rescinding the Clean Power Plan and withdrawing from the Paris Climate Accord, which Trump [delivered in 2019](#) with the repeal of the Clean Power Plan and [serving official notice](#) to the international community of the United States' withdrawal from the Paris agreement.

Ebell also shaped the way the agency functioned in less obvious ways. Ebell [called for cuts](#) to the size of the EPA staff. Despite Congress maintaining the agency's budget, by September of 2018, the [Washington Post reported](#) that slowed hiring had resulted in an 8 percent reduction in EPA's workforce.

Ebell also [called for serious restrictions](#) on how the EPA uses scientific research, which Trump [delivered in 2020](#).

Over the years, Trump's EPA has repeatedly delivered on Myron Ebell's plans crafted in those early days of the Trump administration.

Koch Network

The Koch family's network of dark money groups has a storied influence on American politics, and despite media reports of Trump's [antipathy](#) towards David and Charles Koch, veterans of their vast web of climate-denying think tanks, propagandists, organizers, and lobbying groups [reach the highest levels](#) of his administration.

The Koch influence is so pervasive that their core financial interest, and a major impetus for their ideological project, the vast empire of oil and gas companies that built their immense wealth, is sometimes forgotten. However, as [internal documents](#) reveal, their influence machine has been hard at work in the Trump era, and the administration has been all too willing to grant every [wish on their list](#).

In a [2018 document](#) celebrating their wins in the first year of Trump's presidency, the Koch network wrote they had lobbied to deregulate clean water. They named Obama's stream protection rule and Waters of the U.S. regulation as specific targets, and Trump was all too happy to oblige, [allowing](#) coal companies to "dump mining waste into streams and waterways" as one of his first acts in Congress, and [eliminating](#) the Waters of the U.S. rule in January 2020.

Pipelines are essential to the Kochs' business interests, and they feature prominently in the items on their [wish list](#). They asked for the Keystone XL pipeline to be revived and the Dakota Access pipeline to be completed, and in his first week on the job, Trump [obliged](#). They asked for the environmental approval process for new infrastructure projects to be "streamlined," and Trump responded by [weakening](#) the review process in 2017, and silencing communities' input with his 2020 plan to [gut NEPA](#), the nation's bedrock environmental law.

They were also keen on selling out federal lands to public development, asking for presidential action on national monuments, and a free pass to frack on public and indigenous lands. Trump launched a [review](#) of national monuments in April 2017, and [announced](#) an 85% cut to Bear's Ears and a 50% cut to Grand Staircase Escalante on the last business day of 2017. Internal emails later [revealed](#) that these changes to our national monuments were drawn specifically to accommodate the fossil fuel

companies that wanted to drill and mine areas of those monuments. It was no surprise, then, when Trump [announced](#) he was allowing fracking on federal and indigenous lands on the last business day of 2017.

With an eye to stymying the environmental groups opposing them, the Koch network lobbied for an end to settlements for lawsuits against the EPA, a practice they call “sue and settle.” The Harvard Environmental Law Review [called](#) these complaints “mistaken,” and a “a war of words relying on emotionally charged rhetoric to score political points,” and even the libertarian Niskanen Center [labeled](#) the administration’s argument “nonsensical.” That did not stop Trump from [announcing](#) in October 2017 that he would curb settlements.

The Kochs also lent their influence to priorities shared by other fossil fuel interests, including exiting the Paris Climate Agreement and ending the Clean Power Plan. Trump began the exit from Paris [in 2017](#), leading up to [serving official notice](#) to the international community in 2019. In March 2017, Trump [issued](#) an executive order setting in motion the Clean Power Plan’s repeal. In June 2019, the Trump administration [completed](#) its rollback of the Clean Power Plan, [replacing it](#) with the Affordable Clean Energy rule as a means to [circumvent](#) the legal obstacles to repealing the endangerment finding.

RESEARCH

TRUMP FULFILLED MURRAY ENERGY'S WISH LIST

In March 2017, Murray Energy President Robert E. Murray Sent Trump A Wish List Of Environmental Rollbacks. According to the New York Times: “Environmentalists have expressed alarm at the new direction, and have complained that Mr. Trump was following a blueprint from the coal industry. A confidential memo written by the head of the country’s largest coal mining company suggests they might not be wrong. The memo was written by Robert E. Murray, a longtime Trump supporter who donated \$300,000 to the president’s inauguration. In it, Mr. Murray, the head of Murray Energy, presented Mr. Trump with a wish list of environmental rollbacks just weeks after the inauguration. [...] The March 1 memo, which was obtained by Senator Sheldon Whitehouse of Rhode Island and shared with The New York Times, is addressed to Vice President Mike Pence.” [[New York Times, 1/9/2018](#)]

Murray: “I Gave Mr. Trump What I Called An Action Plan Very Early. It's About Three-And-A-Half Pages And Of What He Needed To Do In His Administration. He's Wiped Out Page One.” “MURRAY: I gave Mr. Trump what I called an action plan very early. It's about three-and-a-half pages and of what he needed to do in his administration. He's wiped out page one. TRUMP: Ready? PRUITT: We're ready. NARRATOR: At the top of Murray's list was the rule that he and Pruitt had sued to stop-Obama's Clean Power Plan.” [[Frontline, PBS, 10/11/17](#)]

The Wish List's 16 Items Included Ending Regulations On Greenhouse Gas Emissions And Ozone Safety, As Well And Cutting EPA Employees And Overhauling The Labor Department's Office Of Mine Safety. According to the New York Times: “The March 1 memo, which was obtained by Senator Sheldon Whitehouse of Rhode Island and shared with The New York Times, is addressed to Vice President Mike Pence. The sweeping wish list of regulatory overhauls includes ending regulations on greenhouse gas emissions and ozone and mine safety, as well as cutting the staff of the Environmental Protection Agency ‘at least in half’ and overhauling the Labor Department’s office of mine safety.” [[New York Times, 1/9/2018](#)]

CLEAN POWER PLAN AND CLEAN AIR ACT

Murray Energy's Memo Called For Eliminating The Clean Power Plan.

According to Murray Energy's memo to the administration, obtained by the New York Times: "The Clean Power Plan must be eliminated. Murray Energy Corporation obtained a stay of this rule before the Supreme Court of the United States on February 3, 2016. This illegal rule will close an additional fifty-six (56) coal-fired electric generating plants, totaling 53,000 megawatts, on top of the 101,000 megawatts (411 coal-fired plants) that President Barack Obama and his Democrat supporters have already closed." [[Murray Energy, Action Plan for the Administration of President Donald J. Trump, Obtained via New York Times, 3/1/2017](#)]

In March 2017, Trump Signed An Executive Order That Set In Motion The Dismantling Of The Clean Power Plan.

According to the New York Times: "President Trump signed an executive order Tuesday that calls on Scott Pruitt, the administrator of the Environmental Protection Agency, to take steps to dismantle the Clean Power Plan, a set of rules regulating energy plants powered by fossil fuels." [[New York Times, 3/27/2017](#)]

In June 2019, The Trump Administration Repealed The Obama-Era Clean Power Plan.

According to Vox: "The Environmental Protection Agency on Wednesday killed President Obama's signature climate change policy, the Clean Power Plan (CPP). It's one of the few definitive wins in the Trump administration's full-court press to undo and weaken environmental regulations. Speaking before an audience that included coal miners wearing reflective shirts and hard hats, EPA Administrator Andrew Wheeler criticized the Obama policy, which required states to meet targets for cutting greenhouse gas emissions from power plants and aimed to reduce US power sector emissions 32 percent below 2005 levels by 2030." [[Vox, 6/19/2019](#)]

Murray Energy's Memo Called For Withdrawing And Suspending The Endangerment Finding For Greenhouse Gases Under The Clean Air Act.

According to Murray Energy's memo to the administration, obtained by the New York Times: "With the overturning of the Clean Power Plan, there must be a withdrawal and suspension of the implementation of the so-called 'endangerment finding' for greenhouse gases. EPA's 'endangerment finding' under the Clean Air Act serves as the foundation for the agency's far reaching regulation of the economy in the form of emission limitations for greenhouse gases, including carbon dioxide. The high degree of uncertainty in the range of data relied upon by EPA combined with the enormous regulatory costs without concomitant benefits merit revisiting the

'endangerment finding.'" [[Murray Energy, Action Plan for the Administration of President Donald J. Trump, Obtained via New York Times, 3/1/2017](#)]

Background: The Endangerment Finding Requires The EPA To Take Action Under The Clean Air Act To Curb Greenhouse Gas Emissions. According to the Natural Resources Defense Council: "In 2009, the U.S. Environmental Protection Agency (EPA) issued its science-based finding that the buildup of heat-trapping greenhouse gases in the atmosphere endangers public health and welfare. The 'Endangerment Finding' reflects the overwhelming scientific evidence on the causes and impacts of climate change. It was made after a thorough rulemaking process considering thousands of public comments, and was upheld by the federal courts. The Endangerment Finding requires the EPA to take action under the Clean Air Act to curb emissions of carbon dioxide, methane, and four other heat-trapping air pollutants from vehicles, power plants, and other industries. The EPA's Endangerment Finding followed the Supreme Court's landmark 2007 decision in *Massachusetts v. EPA* holding that greenhouse gases are air pollutants covered by the Clean Air Act. This law, the Court held, obligates the EPA to curb pollutants that endanger public health and welfare, including by contributing to climate change." [[NRDC, Fact Sheet, May 2017](#)]

Murray Said The Endangerment Finding Needed To Be Overturned "Because Carbon Dioxide Is Not A Pollutant." According to The Guardian: "Murray has presented Trump with a plan, part of which would overturn many of the protections brought under Obama in by the EPA, including the 2009 classification of carbon dioxide as a pollutant – a ruling known as 'the 'endangerment finding'. 'Carbon dioxide under the Clean Air Act of 1971 was never a pollutant,' said Murray. 'That endangerment finding needs to be overturned. It's on my list of what needs to be done, because carbon dioxide is not a pollutant.'" [[The Guardian, 3/27/17](#)]

In 2018, The Trump Administration Sought To Bend The Legal Interpretation Of The Endangerment Finding To Limit Its Scope. According to ThinkProgress: "A paper published in *Science* last week shows that in the decade since the initial finding, the evidence supporting the endangerment finding has only mounted. Not only has the science solidified around issues of public health and sea-level rise, but this new report notes that climate change also threatens the public by spurring violence, fueling political instability and hampering economic growth. This is perhaps one reason why the Trump administration has refrained from mounting a full-scale assault on the endangerment finding itself and is instead merely looking to limit its scope. [...] By reinterpreting the endangerment finding, Trump's EPA could weaken limits on carbon pollution without having to challenge the mountains of research showing that climate change poses a threat to public health.

Thus, while the finding is unlikely to be overturned, vital climate protections are nonetheless at risk as political appointees may still find legal workarounds that let polluters have free rein." [[ThinkProgress, 12/19/2018](#)]

In August 2018, The Administration Announced The Affordable Clean Energy (ACE) Rule As An Attempt To Circumvent Legal Obstacles To Repealing The Endangerment Finding. According to E&E News: "Conservatives yesterday hailed the Trump administration's Clean Power Plan replacement as a return to federalism, but some warned the fight to eviscerate the endangerment finding is still a hot topic. EPA's 2009 ruling that greenhouse gases pose a threat to public health is the legal basis for climate rules under the Clean Air Act. It's what forced the agency to issue a new proposal — the Affordable Clean Energy (ACE) rule — yesterday rather than repeal its greenhouse gas regulations altogether, and acting EPA Administrator Andrew Wheeler has said the issue is settled law (Greenwire, Aug. 21). 'Just to be clear, this is a regulation of greenhouse gases,' EPA air chief Bill Wehrum said of ACE yesterday. 'No doubt about it.'" [[E&E News, 8/22/2018](#)]

- **ACE Would Set Guidelines For States To Curb Emissions By Strictly Focusing On Efficiency Improvements.** According to E&E News: "ACE would set guidelines for states to curb emissions by strictly focusing on efficiency improvements, a proposal that Ebell said would provide 'minimal regulation of greenhouse gas emissions from existing power plants.' [...] States would have three years to draft plans under guidelines for slashing greenhouse gas emissions from EPA, though the proposal does not include a minimum requirement for carbon emission reductions." [[E&E News, 8/22/2018](#)]
- **The Rule Marked A "Significant Departure" From The Clean Power Plan's Systemwide Approach To Cutting Emissions.** According to E&E News: "The rule would mark a significant departure from the Obama administration's Clean Power Plan, which took a systemwide approach to cutting greenhouse gases." [[E&E News, 8/22/2018](#)]

RENEWABLE TAX CREDITS

Murray Energy's Memo Called For Elimination Of The 30 Percent Production Tax Credit For Windmills And Solar Panels In Electricity Generation.

According to Murray Energy's memo to the administration, obtained by the New York Times: "Eliminate the thirty (30) percent production tax credit for windmills and solar panels in electricity generation. Electricity generated by windmills and solar panels costs twenty-six (26) cents per kilowatt hour with

a four (4) cent per kilowatt hour subsidy from the American taxpayers. These energy sources are unreliable and only available if the wind blows or the sun shines. Coal-fired electricity costs only four (4) cents per kilowatt hour. Low cost electricity is a staple of life, and we must have a level playing field in electric power generation without the government picking winners and losers by subsidizing wind and solar power." [[Murray Energy, Action Plan for the Administration of President Donald J. Trump, Obtained via New York Times, 3/1/2017](#)]

Larry Kudlow In 2018: "We Want To End All Of Those Subsidies." In a December 2018 press release, the Governors Wind & Solar Energy Coalition wrote: "White House economic adviser Larry Kudlow said yesterday that the White House wants to end subsidies for electric vehicles and other items, including renewable energy. 'As a matter of our policy, we want to end all of those subsidies,' Kudlow told reporters, according to Reuters. 'And by the way, other subsidies that were imposed during the Obama administration, we are ending, whether it's for renewables and so forth.'" [Governors Wind & Solar Energy Coalition, [12/5/2018](#)]

Trump Administration Killed The Solar Investment Tax Credit In 2019, Left Wind Credit In Place. In December 2019, Green Tech Media reported: "The decision to leave tax credits for solar energy and electric vehicles out of this week's \$1.37 trillion spending deal came from the White House on Monday night, according to six sources with knowledge of the negotiations. Though advocates say they won legislative backing for clean energy tax benefits, the White House rejected incentives including a short extension of the solar Investment Tax Credit and the federal EV income tax credit during its review of the package. A congressional aide confirmed that the White House eliminated these provisions." [Green Tech Media, [12/19/19](#)]

EXITING THE PARIS CLIMATE ACCORD

Murray Energy's Climate Memo Called For Withdrawing The U.S. From The Paris Climate Accord. According to Murray Energy's memo to the administration, obtained by the New York Times: "The United Nation's COP 21 Paris Climate Accord, to which Barack Obama has already committed one (1) billion dollars of America's money, is an attempt by the rest of the world to obtain funding from our Country. It is an illegal treaty never approved by Congress, and it will have no effect on the environment." [[Murray Energy, Action Plan for the Administration of President Donald J. Trump, Obtained via New York Times, 3/1/2017](#)]

In November 2019, Trump Notified The United Nations That The U.S. Was Withdrawing From The Paris Climate Accord. According to the New York Times: “The Trump administration formally notified the United Nations on Monday that it would withdraw the United States from the Paris Agreement on climate change, leaving global climate diplomats to plot a way forward without the cooperation of the world’s largest economy. The action, which came on the first day possible under the accord’s complex rules on withdrawal, begins a yearlong countdown to the United States exit and a concerted effort to preserve the Paris Agreement, under which nearly 200 nations have pledged to cut greenhouse emissions and to help poor countries cope with the worst effects of an already warming planet.” [[New York Times, 11/4/2019](#)]

REPEALING MERCURY AND OZONE REGULATIONS

Murray Energy’s Memo Called For Ending The Electric Utility Maximum Achievable Technology And Ozone Regulations. According to Murray Energy’s memo to the administration, obtained by the New York Times: “End the electric utility maximum achievable technology and ozone regulations. We have won these issues in the United States Supreme Court, and these rules must be completely overturned.” [[Murray Energy, Action Plan for the Administration of President Donald J. Trump, Obtained via New York Times, 3/1/2017](#)]

Mercury and Air Toxics (MATS) Maximum Achievable Control Technology (MACT) Rule Rollbacks

The Mercury And Air Toxics Rule Established MACT (Maximum Achievable Control Technology) For Toxic Emissions From Power Plants. “EPA is reviewing the benefit-cost analysis it prepared in 2011 for the Mercury and Air Toxics (MATS) rule, raising questions about whether the agency will take additional action on the rulemaking in 2019. Promulgated in February 2012, the MATS rule established MACT standards under Section 112 of the CAA to reduce mercury and acid gases from most existing coal- and oilfired power plants.” [[Congressional Research Service, 4/18/2019](#)]

The Mercury And Air Toxics Standards Reduce Mercury, Soot, Lead, Arsenic, Sulfur Dioxide, Acid Gas, And Other Pollutants From Coal Power Plants. According to the Environmental Defense Fund, “The Mercury and Air Toxics Standards reduce mercury, soot, lead, arsenic, sulfur dioxide, acid

gases, and other toxic pollution from our nation's coal-fired power plants. The standards prevent up to 11,000 deaths and 130,000 asthma attacks among children every year." [[Environmental Defense Fund, accessed 6/20/2020](#)]

Trump's EPA Undermined The Legal Basis For The Mercury And Air Toxics Standards By Ignoring The Benefits Of Protecting People From Other Pollutants. On April 16, 2020, The Hill reported: "The Environmental Protection Agency (EPA) on Thursday finalized a decision that critics say threatens regulations designed to limit pollution from power plants. The finalized rule doesn't roll back the Mercury and Air Toxics Standards (MATS). Instead, it undermines the rule by preventing the agency from weighing certain "co-benefits" in its justification for the standards. The current and previous administrations have very different interpretations of the same pollution standards; an Obama administration analysis said benefits like reducing other toxins from power plants would save consumers as much as \$90 billion, but the Trump administration said the rules would only save between \$4 million and \$6 million." [[The Hill, 4/16/2020](#)]

Ozone Regulations

In June 2017, Trump's EPA Announced Intention To Delay Implementation Of A Stricter Regulation On Ozone Pollution Passed Under Obama. In June 2017, Trump's EPA published the following announcement: "The Environmental Protection Agency (EPA) is announcing that it is using its authority under the Clean Air Act (CAA) to extend by 1 year the deadline for promulgating initial area designations for the ozone national ambient air quality standards (NAAQS) that were promulgated in October 2015. The new deadline is October 1, 2018." [Federal Register, Vol. 82, No. 123 / Wednesday, [June 28, 2017](#)]

After A Lawsuit, Trump's EPA Agreed It Would Not Delay Implementation Of Obama Ozone Regulations. In August 2017, the New York Times reported: "The Trump administration said late Wednesday that it would not delay an Obama-era regulation on smog-forming pollutants from smokestacks and tailpipes, a move that environmental groups hailed as a victory. The Environmental Protection Agency decision came a day after 16 state attorneys general, all Democrats, filed a lawsuit challenging the delay with the United States Court of Appeals for the District of Columbia. It reversed a decision that Scott Pruitt, the E.P.A. administrator, made in June to put off an Oct. 1 deadline for designating which areas of the country met new ozone standards." [New York Times, [8/3/2017](#)]

FUNDING CLEAN COAL TECHNOLOGIES

Murray Energy's Memo Called For Funding The Development Of Certain Clean Coal Technologies. According to Murray Energy's memo to the administration, obtained by the New York Times: "The Federal government must support the development of some Clean Coal Technologies, including: ultra super critical combustion; high efficiency, low emission coal firing; combined cycle coal combustion; and others. It should not fund so-called carbon capture and sequestration ('CCS'), as it does not work, practically or economically. Democrats and some Republicans use CCS as a political cover to insincerely show that they are proposing something for coal. But, carbon capture and sequestration is a pseudonym for 'no coal.'" [[Murray Energy, Action Plan for the Administration of President Donald J. Trump, Obtained via New York Times, 3/1/2017](#)]

In One Week In 2018, Trump Signed Tax Credits For Carbon Capture Into Law And Proposed Restoring Funding For "Clean Coal" Efforts. According to the Washington Post: "Last Friday, Trump signed a spending deal that included a new tax credit for projects attempting carbon capture — a process by which carbon dioxide is caught and stored underground instead of being released into the atmosphere and contributing to climate change. Then on Monday, the White House released a budget proposal that restored funding to the Energy Department's 'clean coal' efforts. The Trump administration called for \$502 million in funding for Fossil Energy Research and Development program, according to a summary released by the department." [[Washington Post, 2/13/2018](#)]

OVERHAULING THE DEPARTMENT OF LABOR'S MINE SAFETY AND HEALTH ADMINISTRATION

Murray Energy's Memo Called For Overhauling The Mine Safety And Health Administration Of The U.S. Department Of Labor. According to Murray Energy's memo to the administration, obtained by the New York Times: "Overhaul the bloated and politicalized Mine Safety and Health Administration of the U.S. Department Of Labor. This Federal agency, over the past eight (8) years, has not been focused on the coal miner safety, but on politics, bureaucracy, waste, and violation quotas. While coal mine employment has been cut in half, the Federal Mine Safety and Health Administration has continued to hire inspectors every year. But, the government has nowhere to put them. Murray Energy Corporation received

an average of 532 Federal inspectors per month in 2016. We must send a Company manager with every one of these inspectors, taking us away from our employee safety inspections and safety training.” [\[Murray Energy, Action Plan for the Administration of President Donald J. Trump, Obtained via New York Times, 3/1/2017\]](#)

In April 2018, The Mine Safety And Health Administration Rolled Back Workplace Inspection Protections For Miners. According to Politico: “Under the Obama administration, inspections had to occur before workers began their shifts — to scale away, for instance, loose pieces of rock that might fall on them. But in April, the Zatezalo-led Mine Safety and Health Administration said it would allow inspections to begin while miners were already at work. The change was first proposed two months before Zatezalo was confirmed. ‘These additional amendments provide mine operators additional flexibility in managing their safety and health programs and reduces regulatory burdens without reducing the protections afforded miners,’ MSHA wrote in the final rule.” [\[Politico, 9/3/2018\]](#)

In June 2019, A Federal Appeals Court Struck Down Trump's Rewrite Of Mine-Safety Regulations. According to Reuters: “A divided federal appeals court on Tuesday struck down the Trump administration’s rewrite of mine-safety regulations that had been finalized at the end of the Obama presidency, finding the amendment improperly scaled back protections for the miners. The U.S. Court of Appeals for the District of Columbia Circuit struck down an April 2018 amendment to workplace-inspection and recordkeeping rules for non-coal mines. It ordered the Labor Department and its Mine Safety & Health Administration to reinstate the January 2017 version, which had drawn heavy opposition from the National Mining Association and other industry groups.” [\[Reuters, 6/11/2019\]](#)

A Former Member Of The Federal Mine Safety And Health Review Commission Accused Trump’s Labor Department Of Undermining Protections For Miners. According to The Hill: “A former member of the independent federal commission overseeing mine safety accused the Trump administration in a scathing report of endangering the lives of mine workers. The report from Robert Cohen, a George W. Bush appointee who was kept in his post on the Federal Mine Safety and Health Review Commission by an appointment by former President Obama, said Labor Secretary Alexander Acosta has cut back on worker safety rules, NBC News reported Monday. Acosta threatens to undermine the ‘most powerful tool for protecting the lives of the nation’s miners,’ Cohen wrote in a dissent to the Trump administration’s decision to ease tough regulations against the Pocahontas Coal Company’s Affinity Mine in West Virginia that was repeatedly cited for safety concerns.” [\[The Hill, 9/18/2018\]](#)

CUTTING EPA STAFF

Murray Energy's Memo Called For Cutting The Staff Of The U.S.

Environmental Protection Agency In At Least Half. According to Murray Energy's memo to the administration, obtained by the New York Times: "Cut the staff of the U.S. Environmental Protection Agency in at least half. Tens of thousands of government bureaucrats have issued over 82,000 pages of regulations under Obama, many of them regarding coal mining and utilization. The Obama EPA, alone, wrote over 25,000 pages of rules, thirty-eight (38) times the words in our Holy Bible." [[Murray Energy, Action Plan for the Administration of President Donald J. Trump, Obtained via New York Times, 3/1/2017](#)]

During The First 18 Months Of The Trump Administration, The EPA's Workforce Shrunk By 8 Percent. According to The Washington Post: "On the campaign trail, Donald Trump vowed to dismantle the Environmental Protection Agency 'in almost every form. We're going to have little tidbits left, but we're going to take a tremendous amount out.' As president, he is making headway on that promise. During the first 18 months of the Trump administration, records show, nearly 1,600 workers left the EPA, while fewer than 400 were hired. The exodus has shrunk the agency's workforce by 8 percent, to levels not seen since the Reagan administration. The trend has continued even after a major round of buyouts last year and despite the fact that the EPA's budget has remained stable." [[Washington Post, 9/8/2018](#)]

Washington Post Headline: "With A Shrinking EPA, Trump Delivers On His Promise To Cut Government." In September 2018, the Washington Post reported: "On the campaign trail, Donald Trump vowed to dismantle the Environmental Protection Agency "in almost every form. We're going to have little tidbits left, but we're going to take a tremendous amount out." As president, he is making headway on that promise. During the first 18 months of the Trump administration, records show, nearly 1,600 workers left the EPA, while fewer than 400 were hired. The exodus has shrunk the agency's workforce by 8 percent, to levels not seen since the Reagan administration. The trend has continued even after a major round of buyouts last year and despite the fact that the EPA's budget has remained stable." They went on to write: "According to data released under the Freedom of Information Act and analyzed by The Washington Post, at least 260 scientists, 185 "environmental protection specialists" and 106 engineers are gone. Several veteran EPA employees, who have worked for both Republican and Democratic administrations, said the agency's profound policy shifts under Trump -hastened their departure." [[Washington Post, 9/8/2018](#)]

CROSS-STATE AIR POLLUTION RULE

Murray Energy's Memo Called For Overturning The Cross-State Air Pollution Rule. According to Murray Energy's memo to the administration, obtained by the New York Times: "Overturn the recently enacted cross-state Air Pollution rule. This regulation particularly punishes states in which coal mining takes place to the benefit of other wealthier east coast states." [[Murray Energy, Action Plan for the Administration of President Donald J. Trump, Obtained via New York Times, 3/1/2017](#)]

In December 2018, Trump's EPA Issued A Final Rule Rejecting An Update To The "Good Neighbor Provision" Of The Clean Air Act. According to Reuters: "At issue is an update to the 'Good Neighbor Provision' of the Clean Air Act, a requirement that the U.S. Environmental Protection Agency (EPA) step in when smog emissions from states prevent their downwind neighbors from meeting federal smog health standards. The provision was introduced by the administration of former President Barack Obama. Last month the EPA finalized a rule rejecting that update, arguing it was not needed." [[Reuters, 1/31/2019](#)]

In September 2019, A Federal Court Ruled Trump's Cross-State Air Pollution Rule Update Was Inconsistent With The Clean Air Act. According to E&E News: "EPA must go back to the drawing board on part of its Cross-State Air Pollution Rule update, a panel of federal judges ruled today. The U.S. Court of Appeals for the District of Columbia Circuit sided with environmentalists' claim that the Obama-era Cross-State Air Pollution Rule (CSAPR) update is inconsistent with Clean Air Act attainment deadlines but tossed other arguments. The regulation, which the Trump administration defended, was designed to reduce coal-fired power plant pollution that drifts across state lines and causes ozone problems for downwind neighbors. It targets emissions of nitrogen oxides in 22 states whose own plans to reduce cross-state pollution fell short of EPA's standards." [[E&E News, 9/13/2019](#)]

- **The Court Found The EPA's Rule Update Allowed Upwind States To Contribute To Downwind Air Quality Problems.** According to E&E News: "EPA's rule 'allows upwind States to continue their significant contributions to downwind air quality problems beyond the statutory deadlines by which downwind States must demonstrate their attainment of air quality standards,' the court found. 'In all other respects, though, we determine that EPA acted lawfully and rationally.' The judges declined to scrap the rule but said environmental challengers can bring a new petition to the D.C. Circuit if EPA does not modify the regulation to reflect the court's finding." [[E&E News, 9/13/2019](#)]

COAL MINE DUST REGULATION

Murray Energy's Memo Called For Revising The Coal Mine Dust Regulation. According to Murray Energy's memo to the administration, obtained by the New York Times: "Revise the arbitrary Coal Mine Dust Regulation of the Mine Safety and Health Administration of the Department of Labor. This regulation provides no health benefit to our coal miners, and threatens the destruction of thousands of coal mining jobs." [[Murray Energy, Action Plan for the Administration of President Donald J. Trump, Obtained via New York Times, 3/1/2017](#)]

In The Fall Of 2017, The Trump Administration Announced A Review Of The Coal Mine Dust Rule. According to the Office of Management and Budget's Office of Information and Regulatory Affairs: "MSHA is requesting public comment on two issues: (1) MSHA's existing standards and regulations that could be improved or made more effective or less burdensome by accommodating advances in technology, innovative techniques, or less costly methods, including the requirements that could be streamlined or replaced in frequency; and (2) The Agency's retrospective review of the final rule entitled Lowering Miners' Exposure to the Respirable Coal Mine Dust, Including Continuous Personal Dust monitors (CPDM) (Dust). Stakeholder comments will assist MSHA in evaluating whether modifications of existing standards and regulations can better achieve regulatory objectives and, for the retrospective study, will assist MSHA in evaluating whether the final Dust rule is achieving respirable dust levels to protect miners' health." [[RegInfo.Gov, 1219-AB88, Regulatory Reform of Existing Standards and Regulations; Retrospective Study of Respirable Coal Mine Dust Rule, Fall 2017](#)]

In 2019, The Notice And Comment Period On The Rule's Study Was Extended Until July 2022. According to the Federal Register: "The Mine Safety and Health Administration (MSHA) is extending the comment period on the Request for Information on a Retrospective Study of Respirable Coal Mine Dust Rule. The comment period is extended until July 9, 2022. Pursuant to MSHA's ongoing study, this extension gives stakeholders additional time to provide input on developing the framework to assess the impact of the final rule, Lowering Miners' Exposure to Respirable Coal Mine Dust, Including Continuous Personal Dust Monitors and to provide MSHA information and data on engineering controls and best practices that lower miners' exposure to respirable coal mine dust." [[Federal Register, 84 FR 31809 - Retrospective Study Of Respirable Coal Mine Dust Rule, 7/3/2019](#)]

BENEFITS FOR RETIRED COAL MINERS

Murray Energy's Memo Called For Funding Retiree Medical Care And Pensions For All Of America's United Mine Workers Of America (UMWA) Retired Coal Miners. According to Murray Energy's memo to the administration, obtained by the New York Times: "Obtain legislation to fund both the retiree medical care and pensions for all of America's United Mine Workers of America (UMWA)-represented, retired coal miners. For four (4) years, Senate Majority Leader Mitch McConnell has refused to address this issue. Some say that this is because of UMWA wrongly opposed him in his recent election. This must be taken care of. And the legislation enacted must address not just those recently orphaned through company bankruptcies and mine closures, but the medical benefits and pensions that were promised to all retired miners by the Federal government itself." [[Murray Energy, Action Plan for the Administration of President Donald J. Trump, Obtained via New York Times, 3/1/2017](#)]

In December 2019, Congress Passed Legislation To Fund Pensions For Retired Coal Miners. According to the New York Times: "The \$1.4 trillion spending bill passed by Congress last week quietly achieves what a parade of select committees and coordinating councils could not: rescue a dying pension fund that is the lifeblood of nearly 100,000 retired coal miners. For the first time in 45 years of federal pension law, taxpayer dollars will be used to bail out a fund for workers in the private sector. And now that there's a precedent, it might not be the last." [[New York Times, 12/24/2019](#)]

PATTERN OF VIOLATIONS RULE

Murray Energy's Memo Called For Overturning The Pattern Of Violations Rule. According to Murray Energy's memo to the administration, obtained by the New York Times: "Overturn the Mine Safety and Health Administration, Department of Labor, Pattern of Violations rule. This rule is a punitive action of the Mine Safety and Health Administration under its Director for the past eight (8) years, the former Safety Director of a labor union." [[Murray Energy, Action Plan for the Administration of President Donald J. Trump, Obtained via New York Times, 3/1/2017](#)]

Trump's Mine Safety And Health Administration Sought To Undercut Enforcement Of The Pattern Of Violations Rule. According to BuzzFeed News: "The head of the agency pushing these changes is former coal company executive David Zatezalo, who was appointed late last year to run the federal Mine Safety and Health Administration. Previously, he chaired a coal industry group and ran a coal company that was repeatedly cited for safety

violations. Under his leadership, the agency has taken steps that undercut enforcement of the so-called 'pattern of violations' rule, which enables regulators to mete out strict penalties to unsafe operators." [[BuzzFeed News, 9/24/2018](#)]

Trump Nominated David Zatezalo, Former Rhino Resources Chairman, To Head The Mine Safety And Health Administration. According to The Hill: "The Senate voted Wednesday to confirm David Zatezalo, a former coal mining executive who faced harsh criticism over his company's safety record, to lead the federal government's mine safety agency. [...] Zatezalo, a West Virginia native, retired in 2014 as head of Rhino Resources, a coal mining company. Rhino had numerous run-ins with MSHA enforces under his leadership, including two "pattern of violations" letters, a rare warning from regulators." [[The Hill, 11/15/2017](#)]

- **Under Zatezalo's Chairmanship, Rhino Resources Received Citations Under The Pattern Of Violations Rule.** According to Charleston Gazette-Mail: "In 2010 and 2011, while Zatezalo was a top Rhino executive, the company had a series of run-ins with MSHA over safety and health conditions at mines in West Virginia and Kentucky, during a period when then-MSHA chief Joe Main was ramping up agency enforcement following the deaths of 29 miners at Massey Energy's Upper Big Branch Mine in April 2010. One of Rhino's mines received back-to-back warning letters from MSHA about a 'pattern of violations' at the operation and another Rhino mine was targeted by a rare MSHA lawsuit after agency staffers said they caught officials there providing advance notice of an MSHA inspection to workers underground." [[Charleston Gazette-Mail, 9/5/2017](#)]
- **Bob Murry, CEO Of Murray Energy, Reportedly Encouraged Zatezalo To Seek The Mine Safety And Health Administration Post.** According to Charleston Gazette-Mail: "David Zatezalo, the Trump administration's pick to serve as the nation's top mine safety and health regulator, confirmed on Tuesday that Murray Energy CEO Bob Murray, the outspoken and controversial owner of West Virginia's largest coal producer, was among those in the industry who urged him to seek out the post. 'He was one of the people whose opinion I value and who I talked to about it after the idea came up,' Zatezalo said in a phone interview." [[Charleston Gazette-Mail, 9/5/2017](#)]

SUPREME COURT APPOINTMENTS

Murray Energy's Memo Called For Appointing Industry-Friendly Judges To The Supreme Court. According to Murray Energy's memo to the administration, obtained by the New York Times: "Appoint justices to the Supreme Court of the United States who will follow our United States Constitution and our laws. We must offset the liberal appointees who want to redefine our Constitution and our laws." [[Murray Energy, Action Plan for the Administration of President Donald J. Trump, Obtained via New York Times, 3/1/2017](#)]

Justice Brett Kavanaugh Was Praised By The Oil And Gas Industry For His Record On Energy And Environmental Cases. According to E&E News: "A D.C. Circuit judge since 2006, Kavanaugh has handled more energy and environmental cases than any other short-listers for Kennedy's seat. His skepticism toward a number of EPA programs has won praise from industry and criticism from the environmental community." [[E&E News, 7/10/2018](#)]

As A Judge On The U.S. Court Of Appeals For The District Of Columbia Circuit, Kavanaugh Voiced His Opposition To The Clean Power Plan. According to E&E News: "Kavanaugh has weighed in on dozens of high-profile environmental cases, including litigation over the Obama administration's landmark Clean Power Plan. Though the appeals court never issued an opinion in that case, Kavanaugh made his position clear during marathon oral arguments in 2016. He argued that the sweeping climate rule should be subject to a stricter degree of scrutiny because of its 'transformative' effect. He also argued that the urgency of climate change does not authorize EPA to exceed its authority (Energywire, Sept. 28, 2016)." [[E&E News, 7/10/2018](#)]

Kavanaugh Also Dissented In Cases Where The Court Of Appeals Upheld EPA Actions Under The Clean Air Act. According to E&E News: "Kavanaugh has been reluctant to give EPA deference in other Clean Air Act litigation, too. He dissented from his colleagues in 2012 when they upheld earlier greenhouse gas regulations and dissented again when the court approved EPA standards for mercury and other hazardous air pollution from power plants." [[E&E News, 7/10/2018](#)]

While Sitting On The 10th U.S. Circuit Court Of Appeals, Justice Neil Gorsuch Criticized A Key Supreme Court Decision (Chevron v. NRDC) That Granted Agencies Deference When Interpreting Vague Federal Law. According to the Center for American Progress: "Judge Gorsuch's opinion harshly criticized the Supreme Court's 1984 Chevron decision, which says that courts should not second-guess an agency's interpretation of a vague federal law unless

the agency clearly got it wrong. Judge Gorsuch argued that this common-sense rule—one that federal agencies have relied on for decades—allows agencies ‘to swallow huge amounts of core judicial and legislative power and concentrate federal power.’ He complained that it made complying with federal regulations so complicated that one needed ‘an army of perfumed lawyers and lobbyists’ to obey the law.” [[Center for American Progress, 2/1/2017](#)]

The Legal Doctrine Established In The Chevron Case Provided The EPA With Leeway In Using The Clean Air Act To Control Carbon Dioxide Pollution.

According to Inside Climate News: “Chevron is one of the pillars of modern regulatory law, and it matters greatly to climate change activists because it has provided the Environmental Protection Agency considerable leeway in using the Clean Air Act to control carbon dioxide pollution. Its significance will be stark when the Supreme Court considers the fate of the Clean Power Plan in the next year or so.” [[Inside Climate News, 2/1/2017](#)]

OVERSIGHT BOARDS

Murray Energy’s Memo Called For Replacing Members Of The Federal Energy Regulatory Commission (FERC). According to Murray Energy’s memo to the administration, obtained by the New York Times: “Members of the Federal Energy Regulatory Commission must be replaced. The current Federal Energy Regulatory Commission has a record of favoring actions of the Obama Administration that have destroyed the reliability of America’s electric power grid and which have led to skyrocketing electric power costs, as Mr. Obama, who appointed them, stated would occur in 2008.” [[Murray Energy, Action Plan for the Administration of President Donald J. Trump, Obtained via New York Times, 3/1/2017](#)]

Trump Nominated One Republican To FERC, Instead Of The Traditional Pair Of One From Each Party. In October 2019, Utility Dive reported: “President Donald Trump intends to nominate a Republican for one of two vacancies on the Federal Energy Regulatory Commission, according to a White House announcement Monday. Although the administration had previously advanced pairs of Republican and Democratic nominees together, when possible, Trump will nominate FERC general counsel James Danly. Senate Energy and Natural Resources Ranking Member Joe Manchin, W.Va., noted his disappointment with the administration’s ‘failing to honor the tradition of a bipartisan pairing’ for the independent agency.” [Utility Dive, [10/2/2019](#)]

Murray Energy’s Memo Called For Replacing Members Of The Tennessee Valley Authority (TVA) Board Of Directors. According to Murray Energy’s

memo to the administration, obtained by the New York Times: “Members of the Tennessee Valley Authority Board of Directors must be replaced. The Board of Directors of this government agency has followed the mandates of the Obama Administration, rather than assure reliable, low cost electricity for the Tennessee Valley Authority’s rate payers, who they are mandated to serve in this manner.” [[Murray Energy, Action Plan for the Administration of President Donald J. Trump, Obtained via New York Times, 3/1/2017](#)]

In April 2020, Trump Criticized The TVA Director’s Salary And Suggested He Could Slash The Director’s Compensation As Part Of An Infrastructure Bill.

According to Associated Press: “President Donald Trump took a swipe at the compensation of the Tennessee Valley Authority’s president during his daily coronavirus briefing Wednesday, suggesting the executive’s pay was too high. In response to a reporter’s question, who said the head of TVA ‘made \$8 million last year,’ Trump said it is ‘ridiculous, I agree. It’s ridiculous.’ Trump, who as president appoints the TVA board, suggested he could reduce the TVA president’s salary as part of a coronavirus-related infrastructure bill being considered by Congress. The quasi-federal utility that serves 10 million ratepayers hired president and CEO Jeff Lyash in November.” [[Associated Press, 4/8/2020](#)]

Trump Has Appointed Four Members To The TVA Board Of Directors.

According to Chattanooga Times Free Press: “President Donald Trump on Thursday nominated four new members for the board of the Tennessee Valley Authority, filling all but one of the vacancies on the nine-member governing board for America’s biggest publicly owned utility. The White House picks were all white men, most of whom are business executives, and come from four of the seven Southeastern states served by TVA.” [[Chattanooga Times Free Press, 9/21/2017](#)]

Murray Energy’s Memo Called For Replacing Members Of The National Labor Relations Board (NLRB). According to Murray Energy’s memo to the administration, obtained by the New York Times: “Replace the members of the National Labor Relations Board (‘NLRB’). Eliminate the antiemployer bias of the NLRB by appointing members and staff, particularly in the General Counsel’s office, who will fairly consider the employer’s position and needs and not automatically accede to the unions or unionized employees in every matter considered.” [[Murray Energy, Action Plan for the Administration of President Donald J. Trump, Obtained via New York Times, 3/1/2017](#)]

As Of April 2020, The NLRB Was Composed Of All Republicans. In April 2020, The Nation reported: “The board is currently composed of three white male NLRB members and another white male general counsel (prosecutor)—all Republicans, three with careers representing corporations and one as a

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Republican Capitol Hill staffer. Both Democratic seats are currently vacant. There is nobody currently on the NLRB with experience representing workers or unions. Through these appointees, an agency that is supposed to protect workers' right to organize has taken the law in exactly the opposite direction." [The Nation, [4/7/20](#)]

TRUMP FULFILLED THE AMERICAN PETROLEUM INSTITUTE'S WISH LIST

EMISSIONS STANDARDS

The API Called For Revising Emissions Standards For New, Reconstructed, And Modified Sources. According to a May 2017 document from API: "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources (NSPS 0000a rule) (June 3, 2016; 81 Fed. Reg. 35824) Final rulemaking directly regulates GHGs, in the form of a limitation of methane, as a pollutant. Under the Clean Air Act, the addition of GHGs as a regulated pollutant triggers the development of a regulation to address existing sources across the segments. EPA should revisit the final rule process the agency undertook that failed to demonstrate that the source category represents a 'significant contribution' to endangering public health and welfare. EPA should also continue to work technical issues through administrative reconsideration process and provide immediate compliance date extensions to avoid costly implementation of rule requirement (e.g., leak monitoring and repair) while EPA revisits rule following publication of April 4th Federal Register (82 FR 16331)." [[API Comments on Specific Regulations, 5/15/2017](#)]

In April 2017, The EPA Ordered A Review Of Rule Limiting Methane Emissions At New Oil And Gas Drilling Sites. According to the New York Times: "Ordered review of rule limiting methane emissions at new oil and gas drilling sites. April 18 Who wanted it changed? Lobbyists for the oil and gas industries petitioned Mr. Pruitt to reconsider the rule, which went into effect last August, limiting emissions of methane, smog-forming compounds and other toxic pollutants from new and modified oil and gas wells. They argued the rule was technologically infeasible." [[New York Times, 5/2/2017](#)]

December 2018: The EPA Proposed A Revision Of Greenhouse Gas Emission Standards For New, Modified, And Reconstructed Sources. According to a December 6, 2018 press release from the EPA: "On December 6, 2018, EPA proposed to revise the New Source Performance Standards (NSPS) for greenhouse gas emissions from new, modified, and reconstructed fossil fuel-fired power plants. After further analysis and review, EPA proposes to determine that the best system of emission reduction (BSER) for newly constructed coal-fired units, is the most efficient demonstrated steam cycle in combination with the best operating practices. This proposed BSER would replace the determination from the 2015 rule, which identified the BSER as

partial carbon capture and storage. The primary reason for this proposed revision is the high costs and limited geographic availability of CCS.” [[EPA, Press Release, 12/6/2018](#)]

CLEAN AIR ACT REGULATIONS

Accidental Release Prevention – Chemical Disaster Rule

The API Called For Readdressing Accidental Release Prevention Regulations Under The Clean Air Act. According to a May 2017 document from API: “Accidental Release Prevention Regulations Under Clean Air Act (RMP). EPA promulgated and issued an updated RMP final rule in January 2017 with little to no coordination with OSHA -- if RMP final rule remains as finalized, there will be significant differences between the RMP and PSM rules placing an increased regulatory compliance burden on regulated sites. RMP final rule has significant provisions that have not been shown will improve safety (inspecting all covered units, 3rd party audits, Safer Technology Alternatives & Analysis). EPA has not demonstrated that the benefits of the revised RMP final rule exceed costs. Initiate new rulemaking allowing the various provisions of concern to be readdressed.” [[API Comments on Specific Regulations, 5/15/2017](#)]

In January 2017, The EPA Amended The Accidental Release Prevention Requirements Of The Clean Air Act. According to Harvard University's Environmental and Energy Law Program: “Jan. 13, 2017 EPA publishes the final Accidental Release Prevention Requirements of the Clean Air Act Risk Management Program. March 14, 2017 The rule is set to take effect.” [[Harvard University, Environmental and Energy Law Program, 9/27/2017](#)]

The Trump Administration Sought To Delay Implementation Of The New Regulations Until February 2019. According to Harvard University's Environmental and Energy Law Program: “Jan. 26, 2017 EPA publishes notice that it will delay the Risk Management Program rules until March 21, 2017. Feb. 28, 2017 Several industry groups ask EPA to halt the rule entirely and reconsider the rule. March 16, 2017 EPA publishes a final rule delaying the effective date of the Risk Management Rule to June 19, 2017. June 14, 2017 EPA publishes notice in the Federal Register that it will further delay implementation 20 months, until Feb. 19, 2019.” [[Harvard University, Environmental and Energy Law Program, 9/27/2017](#)]

- **Environmental Groups And 11 States Sued The EPA Over Delays To The Implementation Of Accidental Release Prevention Regulations.**

According to Harvard University's Environmental and Energy Law Program: "June 15, 2017 Environmental groups sue in the DC Circuit Court to stop the rule delays. July 24, 2017 Eleven states sue EPA over the delays: Rhode Island, New York, Illinois, Maine, Maryland, Massachusetts, New Mexico, Oregon, Vermont, and Washington." [[Harvard University, Environmental and Energy Law Program, 9/27/2017](#)]

- **In August 2018, The D.C. Circuit Court Of Appeals Vacated The EPA's Delays Of The New Rules, Writing The Delays Were A "Mockery" Of The Clean Air Act.** According to Harvard University's Environmental and Energy Law Program: "The DC Circuit vacated EPA's delay of the Chemical Disaster Rule on Aug. 17, 2018. The court called the agency's repeated delays of the rule a 'mockery' of the Clean Air Act 'calculated to enable non-compliance.'" [[Harvard University, Environmental and Energy Law Program, 9/27/2017](#)]

In December 2019, The EPA Published A Final Rule Revising Accidental Release Prevention Regulations. According to Harvard University's Environmental and Energy Law Program: "Nov. 20, 2019 EPA releases a final rule revising its Risk Management Program that rolls back most new requirements in its 2017 rule. This final rule is effective upon publication in the Federal Register with no opportunity for public comment. Update: EPA published this final rule in the Federal Register, making it effective, on Dec. 19, 2019." [[Harvard University, Environmental and Energy Law Program, 9/27/2017](#)]

Startup, Shutdown Malfunction (SSM) Exemptions

The API Called For The EPA To Reverse The Elimination Of Startup, Shutdown, Malfunction (SSM) Exemptions To State Implementation Plans (SIPs) Under The Clean Air Act. According to a May 2017 document from API: "Startup, Shutdown, Malfunction (SSM). EPA began a systemic process of eliminating existing SSM exemptions and affirmative defense provisions from various Clean Air Act regulations and previously-approved SIPs. This potentially exposes every Title V-permitted manufacturing company, which must shut down and start up their equipment to conduct maintenance activities and other planned and unplanned outages, to citizen suits and potential civil penalties that can be costly and time consuming. EPA should reverse SSM SIP calls and defend previous SSM interpretations." [[API Comments on Specific Regulations, 5/15/2017](#)]

In 2017, The Trump Administration Sought To Re-Open SSM Exemptions. According to the Sierra Club: "Last week, Trump's EPA convinced the D.C.

Circuit Court of Appeals to put a hold on a case brought by industrial polluters and their state allies that challenged a 2015 Clean Air Act rule eliminating 'startup, shutdown, or malfunction' (SSM) loopholes that allow fossil-fuel facilities to ignore pollution limits. The hold is likely a ploy by the Trump administration to either weaken or scrap the clean air protections to placate the suing fossil fuel interests - who are looking to avoid accountability for their unmitigated air pollution into surrounding communities." [[Sierra Club, 5/5/2017](#)]

In June 2019, The EPA Sought To Reverse An Obama-Era Action Requiring North Carolina To Eliminate SSM Exemptions From The State's Implementation Plan. According to SP Global: "Former U.S. Environmental Protection Agency officials and environmental groups are accusing the Trump administration of attempting an end-run around a national policy governing the excessive release of air pollution at power plants and other industrial facilities, according to public comments submitted to the agency Aug. 5. At issue is a June 5 proposal by the EPA's Region 4 office that would reverse an Obama-era action requiring North Carolina to eliminate exemptions for startup, shutdown and malfunction, or SSM, events from its state implementation plan for addressing ground-level ozone pollution." [[SP Global, 8/8/2019](#)]

National Ambient Air Quality Standards (NAAQS)

The API Called For A Review Of National Ambient Air Quality Standards (NAAQS) Promulgated In 2015. According to a May 2017 document from API: "NAAQS Review: 2015 Ozone NAAQS. A more stringent Ozone NAAQS of 70 ppb was promulgated in 2015 without a sufficient science basis. EPA requested and the Court granted EPA's request to evaluate how the Agency wishes to proceed. EPA will need to report to the court on the status every 90 days. The current NAAQS could result in potential long term non-attainment and over-control of domestic sources attempting to overcome background ozone concentrations. EPA should reconsider the 2015 Ozone NAAQS in a timely fashion. If the EPA does not decide to reconsider 2015 NAAQS, EPA should take steps to expeditiously revoke the 2008 NAAQS." [[API Comments on Specific Regulations, 5/15/2017](#)]

In June 2017, The EPA Delayed State Deadlines For NAAQS. According to an EPA Press Release, "U.S. Environmental Protection Agency (EPA) Administrator Scott Pruitt sent a letter to governors today to inform them of EPA's efforts related to the National Ambient Air Quality Standards (NAAQS) for ozone promulgated in October 2015. EPA is extending the deadline for promulgating initial area designations, by one year, for the 2015 ozone NAAQS. 'States have made tremendous progress and significant investment

cleaning up the air. We will continue to work with states to ensure they are on a path to compliance,' said Administrator Scott Pruitt." [[EPA Press Release, 6/6/2017](#)]

In April 2018, Trump Issued A Presidential Memorandum Ordering The EPA To Make Sweeping Changes To The Implementation Of NAAQS. According to the Union of Concerned Scientists: "12 April 2018: Presidential Memorandum on NAAQS. Presidential Memorandum orders the EPA to make sweeping changes to implementation of the National Ambient Air Quality Standards (NAAQS), including requiring science advisors to consider non-scientific information, restricting the science that can be used in decisionmaking, and shifting responsibility to the states without increasing their resources." [[Union of Concerned Scientists, 9/18/2019](#)]

The API Called For "Maximum Flexibility" In Implementation Of NAAQS Ozone Standards. According to a May 2017 document from API: "NAAQS Implementation (40 CFR Part 51) Implementation rules and associated tools (e.g., robust modeling tools) are not sufficiently flexible and available to implement the NAAQS. Rules should be predictable and provide maximum flexibility to the states and impacted sources. Grandfathering, which is addressed in the NAAQS rule itself, does not provide sufficient transition periods when a NAAQS is revised. The current situation can cause uncertainty and costly delays to both states and businesses. EPA should incorporate the maximum flexibility within the implementation rules." [[API Comments on Specific Regulations, 5/15/2017](#)]

In June 2017, EPA Administrator Scott Pruitt Established "An Ozone Cooperative Compliance Task Force To Develop Additional Flexibilities For States." According to an EPA Press Release, "The National Ambient Air Quality Standard (NAAQS) for ground-level ozone is an outdoor air regulation under the Clean Air Act. As part of the process to determine what areas of the country are able to meet the current air quality standards, states are currently submitting their proposals for area designations under the 70 parts per billion (ppb) standard, which was lowered from 75 ppb in 2015. Areas designated as being in 'nonattainment' of the standard face consequences, including: increased regulatory burdens, restrictions on infrastructure investment, and increased costs to businesses. EPA is giving states more time to develop air quality plans and EPA is looking at providing greater flexibility to states as they develop their plans. And, pursuant to the language in the recently-enacted FY2017 Omnibus funding bill, Administrator Pruitt is establishing an Ozone Cooperative Compliance Task Force to develop additional flexibilities for states to comply with the ozone standard." [[EPA Press Release, 6/6/2017](#)]

In August 2017, The EPA Fought 'Speculative' Bid To Vacate Ozone NAAQS Designations Delay. According to Inside EPA, “EPA is fighting several states’ request for a federal appeals court to vacate the agency’s since-withdrawn notice delaying by one year designations for which areas are attaining the 2015 ozone air standard, saying it is ‘speculative’ for the states to say the delay was unlawful and that EPA should be prevented from trying it again. ‘Petitioners’ concern that the withdrawal could be reversed by the Court in some future action is highly speculative, and could be adequately addressed by the Court in its review of any such future action. Accordingly, that speculation provides no basis for the Court to reach out and vacate an action that the Agency has already withdrawn,’ EPA says in an Aug. 29 filing with the U.S. Court of Appeals for the District of Columbia Circuit.” [\[InsideEPA, 8/30/2017\]](#)

RENEWABLE FUEL STANDARDS

The API Called For Revising And Ultimately Ending The Renewable Fuel Standard Program. According to a May 2017 document from API: “Renewable Fuel Standard Program: Standards for 2017 and Biomass-Based Diesel Volume for 2018. EPA published the final rule December 12, 2016 with an effective date of February 10, 2017. Problematic provisions include: (1) Unrealistic assumptions were used in predicting 2017 volumes of cellulosic biofuel, E85, E15, and E0; and (2) Fuels mandates do not reflect current markets, creating potential for economic harm. (1) EPA should utilize its waiver authority in subsequent annual rulemakings to reduce the advanced, cellulosic, and total renewable fuel obligations to ensure the mandate does not exceed the E10 blend wall. In order to maintain a market for ethanol-free gasoline, EPA should not set a RFS mandate that would cause the average mandated ethanol content to exceed 9.7 percent of projected gasoline demand. (2) EPA should use realistic projections of E0, E15, E85 demand and cellulosic production when setting the annual RVOs. (3) EPA should work with Congress to reform and ultimately end this unworkable program.” [\[API Comments on Specific Regulations, 5/15/2017\]](#)

In December 2019, The EPA Finalized Rules That Increased Biofuels Volumes Under The Renewable Fuel Standard Program. According to a December 19, 2019 press release from the EPA: “Today, the U.S. Environmental Protection Agency (EPA) finalized a rule that establishes the required renewable volumes under the Renewable Fuel Standard (RFS) program for 2020, and the biomass-based diesel volume for 2021. Through this action, the Trump Administration has fulfilled yet another key promise to

the American people, American farmers and American biofuels producers by increasing biofuels volumes under the renewable fuel standard and modifying the program requirements to ensure those volumes are met. The EPA is committed to ensuring a net of 15 billion gallons of conventional biofuel is blended in 2020." [\[EPA, Press Release, 12/19/2019\]](#)

OIL REFINERY REGULATIONS

API Called For Reviewing The 2015 Refinery Sector Risk And Technology Rule. According to a May 2017 document from API: "Petroleum Refinery Sector Risk and Technology Review Rule (December 1, 2015, 80 FR 75178) Final rule published in December 2015 greatly expands control requirements at refinery flares, tanks, pressure-relief devices, and cokers. EPA has lagged in resolving outstanding API petition for reconsideration issues, including those that warrant regulatory language changes. EPA should reaffirm relevant features of the final rule without any increases in stringency. Accelerate pace of issue resolution, especially for issues for which compliance deadlines approach and for those requiring regulatory language changes. EPA should work to more fully develop the record on important aspects of the rule, like the work practice for pressure relief devices and flares." [\[API Comments on Specific Regulations, 5/15/2017\]](#)

In April 2018, The EPA Published Revisions To The Refinery Rule To Address A 2016 Petition From The API. According to Harvard University's Energy and Environmental Law Program: "Jan. 19, 2016 Two industry trade groups, the American Petroleum Institute and the American Fuel and Petrochemical Manufacturers, submit a petition to EPA for reconsideration of certain aspects of the final rule. The groups also file a petition for review with the D.C. Circuit Court of Appeals, American Fuel & Petrochemical, et al v. EPA, no. 16-01033. [...] April 10, 2018 EPA publishes a proposed rule, proposing revisions to the refinery rule to address industry's 2016 petition. The rule proposed technical corrections for work practice standards for flares and pressure relief devices as well as revisions to fence line monitoring, recordkeeping, and reporting. In a press release, EPA stated that the proposal would save industry \$11.5 million in regulatory costs. Comments were due on May 25, 2018." [\[Harvard University, Energy and Environmental Law Program, 12/11/2018\]](#)

In November 2018, The EPA Published A Final Rule Amending The 2015 Petroleum Refinery Regulations. According to Harvard University's Energy and Environmental Law Program: "Nov. 26, 2018 EPA publishes a final rule amending the 2015 NESHAP and NSPS for petroleum refineries. EPA contends that the amendments are insignificant and will not negatively

impact the environment. Many environmental organizations argue that the changes weaken the regulations and provide unnecessary leniency for industry." [[Harvard University, Energy and Environmental Law Program, 12/11/2018](#)]

WATERS OF THE U.S. (WOTUS) RULE

API Called For Repealing The 2015 Waters Of The U.S. Rule. According to a May 2017 document from API: "Clean Water Rule: Definition of 'Waters of the United States,' 80 Fed. Reg. 37,054, (June 29, 2015). We support the review and ultimate revocation of this rule, as well as EPA's current effort to better define waters of the U.S. in a way that will protect waters, promote the goals of federalism, and provide certainty for businesses. [...] Subject to review under Executive Order 13778, Restoring the Rule of Law, Federalism, and Economic Growth by Reviewing the 'Waters of the United States' Rule. Seek revocation, receive clear interim guidance, and replacement with a final rule providing more certainty for all stakeholders." [[API Comments on Specific Regulations, 5/15/2017](#)]

In January 2020, The Trump Administration Finalized Its Rollback Of The Waters Of The U.S. Rule. According to The New York Times: "The Trump administration on Thursday finalized a rule to strip away environmental protections for streams, wetlands and groundwater, handing a victory to farmers, fossil fuel producers and real estate developers who said Obama-era rules had shackled them with onerous and unnecessary burdens. From Day 1 of his administration, President Trump vowed to repeal President Barack Obama's 'Waters of the United States' regulation, which had frustrated rural landowners." [[New York Times, 1/22/2020](#)]

TRUMP DELIVERED ON MYRON EBELL AND THE COMPETITIVE ENTERPRISE INSTITUTE'S WISH LIST

Myron Ebell, Head Of Environmental And Energy Policy At The Competitive Enterprise Institute, Led Trump's EPA Transition Team. According to PBS Frontline: "As Trump now begins the process of staffing his administration, his pick to head the transition team at the EPA, Myron Ebell, offers more insight into the future of U.S. climate policy. Ebell, a leading contrarian of the scientific consensus on global warming, leads environmental and energy policy at the Competitive Enterprise Institute, a libertarian advocacy group financed in part by the fossil fuel industry. Ebell also helps chair the Cooler Heads Coalition, a group which describes its mission as 'dispelling the myths of global warming.' He's been described as 'enemy #1' to the climate change community, and his own bio highlights how he has been named a 'climate criminal' by Greenpeace." [[PBS Frontline, 11/14/2016](#)]

Myron Ebell Wrote An "Agency Action" Plan For The EPA That He Insisted Was Confidential. "We got a sneaky look at the Trump transition team's EPA 'agency action' plan. It's the guiding (aspirational) document written by Myron Ebell of the Competitive Enterprise Institute. One of the striking aspects of the document was its language about the agency's use of scientific research and economic analysis to justify its actions." Axios updated the story with a note saying: "Axios contacted Myron Ebell for comment Sunday night about the action plan, and he didn't dispute the content. After we posted, Ebell said there is a more recent version, with both overlap and differences. He said that because both documents are confidential, he can't say what changed." [[Axios, 1/23/2017](#)]

Ebell's Action Plan Included Rolling Back Six Obama-Era Executive Orders Aimed At Curbing Climate Change And Carbon Emissions, Trump Rescinded All Six. According to CNN: "Ebell, though not a scientist, has emerged as one of the world's foremost climate deniers. A few months before the Paris pact entered its final stage in 2015, he wrote in a blog post that President Barack Obama's 'Clean Power Plan' was 'illegal' and lamented the gains likely to be incurred by 'renewable energy producers' at the expense of coal and natural gas. [...] He suggested in an action plan during the transition that Trump rescind six Obama-era executive orders aimed at curbing climate change and regulating carbon emissions. Trump followed those suggestions after taking office." [[CNN, 6/3/2017](#)]

CNN Headline, 3/28/2017: "6 Obama Climate Policies That Trump Orders Change." In March of 2017, CNN reported with the headline: "6 Obama Climate Policies That Trump Orders Change." The article presented a list of six climate change policies affected by Trump's executive orders, including Obama's 2013 Climate Action Plan, a 2013 executive order on climate change, the 2015 Clean Power Plan, a 2016 moratorium on federal coal leasing, Obama's 2016 memo on the national security threat of climate change, and the Waters of the United States rule. [[CNN, 3/28/2017](#)]

WITHDRAWAL FROM THE PARIS CLIMATE ACCORD

Ebell Outlined A Strategy For Withdrawing From The Paris Climate Accord. According to The Guardian: "A climate action plan Ebell prepared for the incoming president outlines a strategy for withdrawal from the Paris climate agreement, and scrapping Obama's signature clean power plan." [[The Guardian, 2/1/2017](#)]

June 2017: Trump Announced The U.S.' Withdrawal From The Paris Climate Accord. "President Donald Trump announced that the United States would pull out of the Paris climate agreement during a speech in the White House Rose Garden on June 1, 2017. The Paris climate agreement is an international accord negotiated by almost 200 countries, aimed at curbing climate change by reducing greenhouse gas emissions. It is considered one of the strongest environmental policy legacies of President Barack Obama's tenure in office, who called it 'a turning point for our planet.' In the Rose Garden ceremony, Trump said that the the United States would exit the Paris agreement. 'As of today, the U.S. will cease all implementation of the non-binding Paris accord and the draconian financial and economic burdens the agreement imposes on our country,' Trump said." [PolitiFact, [6/1/17](#)]

November 2019: Trump Gave Official Notice Of Withdrawal From The Paris Climate Accord. In November of 2019, the Washington Post reported: "The Trump administration notified the international community Monday that it plans to officially withdraw from the Paris climate accord next fall, a move that will leave the world's second-largest emitter of greenhouse gases as the only nation to abandon the global effort to combat climate change." [[Washington Post, 11/4/2019](#)]

REPEALING THE CLEAN POWER PLAN

Ebell Outlined A Strategy For Rescinding The Clean Power Plan. According to The Guardian: “A climate action plan Ebell prepared for the incoming president outlines a strategy for withdrawal from the Paris climate agreement, and scrapping Obama’s signature clean power plan.” [[The Guardian, 2/1/2017](#)]

NPR: “Trump Administration Weakens Climate Plan To Help Coal Plants Stay Open.” In June of 2019, NPR published a story titled “Trump Administration Weakens Climate Plan To Help Coal Plants Stay Open.” According to the story: “Obama’s Clean Power Plan was far broader in scope, setting state-by-state goals for reducing emissions of planet warming carbon dioxide emissions. The rule let states figure out how to meet those goals but made it likely they would close coal plants because those are the biggest emitters of CO2. The Trump administration’s ACE rule is narrower and regulates emissions of individual power plants. It will require power plant operators to make the plants more efficient and release fewer emissions per megawatt of electricity generated. The administration’s aim is to give coal power plants a chance to stay in business longer despite market pressure from cheaper natural gas, wind and solar.” [[NPR, 6/19/2019](#)]

DRASTIC CUTS TO EPA STAFF & BUDGET

Ebell Said He Would Like To See The Size Of The EPA’s Staff Cut In Half. In January 2017, the AP reported: “The former head of President Donald Trump’s transition team at the Environmental Protection Agency said Thursday he expects the new administration to seek significant budget and staff cuts. Myron Ebell said in an interview with The Associated Press that Trump is likely to seek significant reductions to the agency’s workforce — currently about 15,000 employees nationwide. Ebell, who left the transition team last week, declined to discuss specific numbers of EPA staff that could be targeted for pink slips. Asked what he would personally like to see, however, Ebell said slashing the agency’s size by about half would be a good start.” [[AP, 1/26/2017](#)]

- **Ebell: “Let’s Aim For Half And See How It Works Out, And Then Maybe We’ll Want To Go Further.”** In January 2017, the AP quoted Ebell as saying: “‘Let’s aim for half and see how it works out, and then maybe we’ll want to go further,’ said Ebell, who has returned to his position as director of the Center for Energy and Environment at the Competitive Enterprise Institute.” [[AP, 1/26/2017](#)]

Washington Post Headline: “With A Shrinking EPA, Trump Delivers On His Promise To Cut Government.” In September 2018, the Washington Post reported: “On the campaign trail, Donald Trump vowed to dismantle the Environmental Protection Agency “in almost every form. We’re going to have little tidbits left, but we’re going to take a tremendous amount out.” As president, he is making headway on that promise. During the first 18 months of the Trump administration, records show, nearly 1,600 workers left the EPA, while fewer than 400 were hired. The exodus has shrunk the agency’s workforce by 8 percent, to levels not seen since the Reagan administration. The trend has continued even after a major round of buyouts last year and despite the fact that the EPA’s budget has remained stable.” They went on to write: “According to data released under the Freedom of Information Act and analyzed by The Washington Post, at least 260 scientists, 185 “environmental protection specialists” and 106 engineers are gone. Several veteran EPA employees, who have worked for both Republican and Democratic administrations, said the agency’s profound policy shifts under Trump -hastened their departure.” [Washington Post, [9/8/2018](#)]

Ebell Told Reporters To Expect Trump To Seek A 13 Percent Cut To The EPA Budget. In January 2017, the AP reported: “Though he kept specific recommendations he made to the White House confidential, Ebell suggested it was reasonable to expect the president to seek a cut of about \$1 billion from the EPA’s roughly \$8 billion annual budget. About half the EPA’s budget passes through to state and local governments for infrastructure projects and environmental cleanup efforts that Ebell said Trump supports. He said the cuts would likely fall on the remaining half the agency’s budget, which pays for agency operations and environmental enforcement.” [AP, [1/26/2017](#)]

In 2020, Trump Sought A 26 Percent Cut To The EPA Budget. In February 2020, The Hill reported: “President Trump’s proposed budget for fiscal 2021 calls for significant reductions to environmental programs at federal agencies, including a 26 percent cut to the Environmental Protection Agency (EPA). Trump’s budget would eliminate 50 EPA programs and impose massive cuts to research and development, while also nixing money for the Energy Star rating system. The Energy Star program, which measures the efficiency of electronics and appliances, would instead rely on businesses to pay a fee to participate in the program.” [The Hill, [2/10/20](#)]

UNDERMINING SCIENCE AT THE EPA

Ebell Asked For The EPA To Stop Funding Scientific Research In January 2017, Axios reported that in a list of recommendations for “what can be

done to 'improve the use of science by EPA,'" Ebell included: "The document goes on to recommend what can be done to 'improve the use of science by EPA': 1) EPA should not be funding scientific research." [Axios, [1/23/2017](#)]

Trump's 2020 Budget Attempted To Cut EPA R&D Funding "Nearly In Half." In February 2020, the Hill reported that in the President's 2020 budget proposal: "The budget also would cut research and development funding at the EPA nearly in half, lowering funding from \$500 million to \$281 million. The administration wrote in a budget summary that 'research grants to non-federal entities such as universities, are not required to meet EPA's statutory obligations and therefore would not be funded.'" [The Hill, [2/10/20](#)]

Ebell Asked For The EPA To Stop Using Health Data That Isn't Publicly Available. In January 2017, Axios reported that in a list of recommendations for "what can be done to 'improve the use of science by EPA,'" Ebell included: "2) If EPA uses scientific data for regulation, that data must be publicly available so independent scientists can review it." [Axios, [1/23/2017](#)]

Trump's EPA Pushed Steadily To Ban Health Studies Based On Confidential Data, Hobbling American Public Health. In March 2020, The New York Times reported: "The Trump administration has formally revised a proposal that would significantly restrict the type of research that can be used to draft environmental and public health regulations, a measure that experts say amounts to one of the government's most far-reaching restrictions on science. The revisions made public Tuesday evening mean the Environmental Protection Agency would give preference to studies in which all underlying data is publicly available. That slightly relaxed restrictions in an earlier draft that would have flatly excluded any research that did not offer up its raw data, even if that data included medical information protected by privacy laws or confidentiality agreements. Even with the latest changes, scientists warned that the regulation would let the federal government dismiss or downplay some of the most important environmental research of the past decades. That includes research that definitively linked air pollution to premature deaths but relied on the personal health information of thousands of study subjects who had been guaranteed confidentiality." [New York Times, [3/4/20](#)]

Ebell Asked Trump To Overhaul EPA's Scientific Advisory Process. In January 2017, Axios reported that in a list of recommendations for "what can be done to 'improve the use of science by EPA,'" Ebell included: "3) EPA's science advisory process needs to be overhauled to eliminate conflicts of interest and inherent bias." [Axios, [1/23/2017](#)]

Trump Ordered Agencies To Cut One Third Of Advisory Committees, Many Of Which Provide Scientific Advice. In a June 2019 executive order, Trump wrote: "Each executive department and agency (agency) shall evaluate the need for each of its current advisory committees established under section 9(a)(2) of FACA and those advisory committees established under section 9(a)(1) that are authorized by law but not required by statute (eligible committees). (b) Each agency shall, by September 30, 2019, terminate at least one-third of its current committees established under section 9(a)(2) of FACA." [White House, [6/14/2019](#)]

Ebell Asked Trump To Restrict What Science The EPA Can Use. In January 2017, Axios reported that in a list of recommendations for "what can be done to 'improve the use of science by EPA,'" Ebell included: "4) Science standards need to be developed and implemented to ensure that science policy decisions and epidemiological practices are based on sound science." [Axios, [1/23/2017](#)]

Deceptive Rhetoric

Myron Ebell: The EPA Has Engaged In "Science Manipulation." In January 2017, Axios reported: "We got a sneaky look at the Trump transition team's EPA "agency action" plan. It's the guiding (aspirational) document written by Myron Ebell of the Competitive Enterprise Institute. One of the striking aspects of the document was its language about the agency's use of scientific research and economic analysis to justify its actions. A section titled 'Addendum on the problems with EPA science' leads with this paragraph: 'EPA does not use science to guide regulatory policy as much as it uses regulatory policy to steer the science. This is an old problem at EPA. In 1992, a blue-ribbon panel of EPA science advisers that [sic] 'science should not be adjusted to fit policy.' But rather than heed this advice, EPA has greatly increased its science manipulation.'" [Axios, [1/23/2017](#)]

Columbia's Climate Law Center Tracked 440 Trump Administration Attempts To Restrict Or Prohibit Science Since The 2016 Election. Columbia Law School's Sabin Center for Climate Change Law maintains a Silencing Science Tracker, which "tracks government attempts to restrict or prohibit scientific research, education or discussion, or the publication or use of scientific information, since the November 2016 election." They have documented 440 cases to date since the November 2016 election, the most recent on July 12th, 2020. [Columbia Law School Sabin Center for Climate Change Law, accessed [7/16/20](#)]

TRUMP CAME THROUGH FOR KOCH INDUSTRIES' WISH LIST

DEREGULATING CLEAN WATER

The Koch Network Lobbied For The Removal Of The Bureau of Land Management's Stream Protection Rule. In a Koch Network document obtained by the Intercept's Lee Fang, Koch Network operatives included "BLM Stream Protection Rule" in a list of policy priorities for which they have lobbied the Trump administration and other federal lawmakers. According to the document: "In the first eleven months of Trump's administration, the White House and Congress have closely followed The Network's Roadmap to Repeal, with Congress utilizing the Congressional Review Act more than any other time in its history. This year, thanks in part to its research and outreach efforts across institutions, we have seen progress on many regulatory priorities this Network has championed for years." [[Koch Seminar Network Document](#) published by The Intercept, [2/25/2018](#)]

Trump Killed The Stream Protection Rule, Allowing Coal Companies To "Dump Mining Waste Into Streams And Waterways." In February 2017, Vox reported: "it might seem odd that one of Congress' very first acts would be to kill an obscure Obama-era regulation that restricts coal companies from dumping mining waste into streams and waterways. But that is indeed what's going on. In early February, the House and Senate voted to repeal the so-called "stream protection rule" — using a regulation-killing tool known as the Congressional Review Act. On Thursday, President Trump signed the bill, which means the stream protection rule is now dead. Coal companies will have a freer hand in dumping mining debris in streams." [Vox, [2/16/2017](#)]

The Koch Network Lobbied For The Repeal Of The EPA's Waters Of The US Regulations. In a Koch Network document obtained by the Intercept's Lee Fang, Koch Network operatives included "EPA Waters of the U.S. Regulations" in a list of policy priorities for which they have lobbied the Trump administration and other federal lawmakers. According to the document: "In the first eleven months of Trump's administration, the White House and Congress have closely followed The Network's Roadmap to Repeal, with Congress utilizing the Congressional Review Act more than any other time in its history. This year, thanks in part to its research and outreach efforts across institutions, we have seen progress on many regulatory priorities this Network has championed for years." [[Koch Seminar Network Document](#) published by The Intercept, [2/25/2018](#)]

In 2020 Trump Killed Obama's Waters Of The US Rule, Allowing Fossil Fuel Producers To Heedlessly Pollute American Waterways. In January 2020, the New York Times reported: "The Trump administration on Thursday finalized a rule to strip away environmental protections for streams, wetlands and groundwater, handing a victory to farmers, fossil fuel producers and real estate developers who said Obama-era rules had shackled them with onerous and unnecessary burdens. From Day 1 of his administration, President Trump vowed to repeal President Barack Obama's 'Waters of the United States' regulation, which had frustrated rural landowners. His new rule, which will be implemented in about 60 days, is the latest step in the Trump administration's push to repeal or weaken nearly 100 environmental rules and laws, loosening or eliminating rules on climate change, clean air, chemical pollution, coal mining, oil drilling and endangered species protections." [New York Times, [1/22/20](#)]

ELIMINATING THE CLEAN POWER PLAN

The Koch Network Lobbied For The Removal Of The Clean Power Plan. In a Koch Network document obtained by the Intercept's Lee Fang, Koch Network operatives included "EPA Clean Power Plan" in a list of policy priorities for which they have lobbied the Trump administration and other federal lawmakers. According to the document: "In the first eleven months of Trump's administration, the White House and Congress have closely followed The Network's Roadmap to Repeal, with Congress utilizing the Congressional Review Act more than any other time in its history. This year, thanks in part to its research and outreach efforts across institutions, we have seen progress on many regulatory priorities this Network has championed for years." [Koch Seminar Network Document published by The Intercept, [2/25/2018](#)]

In June 2019, The Trump Administration Repealed The Obama-Era Clean Power Plan. According to Vox: "The Environmental Protection Agency on Wednesday killed President Obama's signature climate change policy, the Clean Power Plan (CPP). It's one of the few definitive wins in the Trump administration's full-court press to undo and weaken environmental regulations. Speaking before an audience that included coal miners wearing reflective shirts and hard hats, EPA Administrator Andrew Wheeler criticized the Obama policy, which required states to meet targets for cutting greenhouse gas emissions from power plants and aimed to reduce US power sector emissions 32 percent below 2005 levels by 2030." [Vox, [6/19/2019](#)]

KEYSTONE XL

The Koch Network Lobbied For The Approval Of The Keystone XL Pipeline. In a Koch Network document obtained by the Intercept's Lee Fang, Koch Network operatives included "Keystone XL Pipeline, Dakota Access Pipeline" in a list of policy priorities for which they have lobbied the Trump administration and other federal lawmakers. According to the document: "In the first eleven months of Trump's administration, the White House and Congress have closely followed The Network's Roadmap to Repeal, with Congress utilizing the Congressional Review Act more than any other time in its history. This year, thanks in part to its research and outreach efforts across institutions, we have seen progress on many regulatory priorities this Network has championed for years." [[Koch Seminar Network Document](#) published by The Intercept, [2/25/2018](#)]

In His First Week In Office, Trump Re-Opened The Approval Process For The Keystone XL Pipeline, Ordered "Expeditious Review." In January 2017, less than a week after taking office, Trump issued an executive order re-opening the permitting process for Keystone XL: "I hereby invite TransCanada Keystone Pipeline, L.P. (TransCanada), to promptly re-submit its application to the Department of State for a Presidential permit for the construction and operation of the Keystone XL Pipeline, a major pipeline for the importation of petroleum from Canada to the United States. The Secretary of State shall, if the application referred to in section 2 is submitted, receive the application and take all actions necessary and appropriate to facilitate its expeditious review." [Federal Register, [1/24/2017](#)]

In March 2019, Trump Approved Construction To Begin On The Keystone XL Pipeline. In March 2019, the Washington Post reported: "President Trump signed a new order Friday granting permission for the construction of the Keystone XL pipeline, marking the White House's latest effort to jump-start one of the most controversial infrastructure proposals in recent U.S. history." [Washington Post, [3/29/2019](#)]

In 2017, Trump Approved Construction On The Dakota Access Pipeline. In January 2017, NPR reported: "President Trump on Tuesday gave the go-ahead for construction of two controversial oil pipelines, the Keystone XL and the Dakota Access." [NPR, [1/24/2017](#)]

DEREGULATING PIPELINE CONSTRUCTION

The Koch Network Lobbied For "Infrastructure Project Permit Streamlining." In a Koch Network document obtained by the Intercept's Lee Fang, Koch

Network operatives included “Infrastructure Project Permit Streamlining” in a list of policy priorities for which they have lobbied the Trump administration and other federal lawmakers. According to the document: “In the first eleven months of Trump’s administration, the White House and Congress have closely followed The Network’s Roadmap to Repeal, with Congress utilizing the Congressional Review Act more than any other time in its history. This year, thanks in part to its research and outreach efforts across institutions, we have seen progress on many regulatory priorities this Network has championed for years.” [[Koch Seminar Network Document](#) published by The Intercept, [2/25/2018](#)]

In 2017, Trump Gutted The Environmental Review Process. In August 2017, Bloomberg reported: “President Donald Trump signed an executive order Tuesday that’s designed to streamline the approval process for building roads, bridges and other infrastructure by establishing ‘one federal decision’ for major projects and setting an average two-year goal for permitting.” Previously, they report, the average environmental review took 4 ½ years. [Bloomberg, [8/15/2017](#)]

In 2019, Trump Gutted NEPA, The Nation’s Bedrock Environmental Law, To Make Way For Pipeline Permits. In July 2020, The New York Times reported: “President Trump on Wednesday unilaterally weakened one of the nation’s bedrock conservation laws, the National Environmental Policy Act, limiting public review of federal infrastructure projects to speed up the permitting of freeways, power plants and pipelines.” [New York Times, [7/15/20](#)]

SELLING OUT PUBLIC LANDS TO OIL & GAS EXECUTIVES

The Koch Network Lobbied For Gutting National Monuments. In a Koch Network document obtained by the Intercept’s Lee Fang, Koch Network operatives included “Review Antiquities Act Abuse” in a list of policy priorities for which they have lobbied the Trump administration and other federal lawmakers. According to the document: “In the first eleven months of Trump’s administration, the White House and Congress have closely followed The Network’s Roadmap to Repeal, with Congress utilizing the Congressional Review Act more than any other time in its history. This year, thanks in part to its research and outreach efforts across institutions, we have seen progress on many regulatory priorities this Network has championed for years.” [[Koch Seminar Network Document](#) published by The Intercept, [2/25/2018](#)]

Trump Ordered A Review Of National Monuments For “Recommendations On Whether Any Of Those Large Tracts Should Be Scaled Back.” In April 2017, the New York Times reported: “President Trump on Wednesday ordered the Interior Department to review the size and scope of national monuments larger than 100,000 acres created since 1996. He wants recommendations on whether any of those large tracts should be scaled back by presidential authority or by Congress. Mr. Trump, signing the order at the Interior Department, described the designations as a ‘massive federal land grab’ and ordered the agency to review and reverse some of them. ‘It’s time to end these abuses and return control to the people, the people of Utah, the people of all of the states, the people of the United States,’ the president said.” [New York Times, [4/26/2017](#)]

Trump Shrank Bears Ears National Monument By 85% And Grand Staircase-Escalante In Half In 2017 Giveaway to Fossil Fuel Companies. In December 2018, the New York Times reported “President Trump sharply reduced the size of two national monuments in Utah on Monday by some two million acres, the largest rollback of federal land protection in the nation’s history. The administration shrank Bears Ears National Monument, a sprawling region of red rock canyons, by 85 percent, and cut another monument, Grand Staircase-Escalante, to about half its current size. The move, a reversal of protections put in place by Democratic predecessors, comes as the administration pushes for fewer restrictions and more development on public lands.” They added “Environmentalists and some native nations say Mr. Trump’s decision will destroy the national heritage and threaten some 100,000 sites of archaeological importance in the monuments’ desert landscapes,” and “Mr. Trump’s move is viewed as a victory for Republican lawmakers, fossil fuel companies and others.” [New York Times, [12/4/2017](#)]

Internal Emails Show That Trump’s Administration Explicitly Shrank National Monuments To Make Way For Fossil Fuel Extraction. In March 2018, the New York Times reported: “The internal Interior Department emails and memos also show the central role that concerns over gaining access to coal reserves played in the decision by the Trump administration to shrink the size of the Grand Staircase-Escalante National Monument by about 47 percent, to just over 1 million acres.” They went on to write, “Mr. Zinke’s staff developed a series of estimates on the value of coal that could potentially be mined from a section of Grand Staircase called the Kaiparowits plateau. As a result of Mr. Trump’s action, major parts of the area are no longer a part of the national monument. From the start of the Interior Department review process, agency officials directed staff to figure out how much coal, oil and natural gas — as well as grass for cattle grazing and timber — had been put

essentially off limits, or made harder to access, by the decision to designate the areas as national monuments. [New York Times, [3/2/2018](#)]

- **Uranium Interests Lobbied Trump's Administration While They Deliberated On Bear's Ears.** In March 2018, the New York Times reported: "In another email exchange, in May, two Bureau of Land Management officials said that Mr. Zinke's chief of staff for policy, Downey Magallanes, had phoned to ask for information on a uranium mill in or near the Bears Ears monument. The request sought "economic data to the extent available," as well as grazing and hunting maps. And on July 17, Ms. Magallanes and Mr. Zinke's counselor for energy policy, Vincent DeVito, met with representatives of a uranium mining company. The company, Energy Fuels Resources Inc., said its representatives hoped to discuss its White Mesa uranium mill as well as the Daneros uranium mine, both adjacent to the Bears Ears monument." [New York Times, [3/2/2018](#)]
- **Orrin Hatch's Staff Lobbied Trump's Department Of Interior On Behalf Of Oil And Gas Interests.** In March 2018, the New York Times reported: "Even before President Trump officially opened his high-profile review last spring of federal lands protected as national monuments, the Department of Interior was focused on the potential for oil and gas exploration at a protected Utah site, internal agency documents show. The debate started as early as March 2017, when an aide to Senator Orrin Hatch, Republican of Utah, asked a senior Interior Department official to consider shrinking Bears Ears National Monument in the southeastern corner of the state." The aide went on to write "'Please see attached for a shapefile and pdf of a map depicting a boundary change for the southeast portion of the Bears Ears monument," said the March 15 email from Senator Hatch's office. Adopting this map would "resolve all known mineral conflicts," the email said, referring to oil and gas sites on the land that the state's public schools wanted to lease out to bolster funds." [New York Times, [3/2/2018](#)]

The Koch Network Lobbied To Allow Fracking On Federal And Indigenous Land. In a Koch Network document obtained by the Intercept's Lee Fang, Koch Network operatives included "BLM Rule Preventing Fracking On Federal And Indigenous Land" in a list of policy priorities for which they have lobbied the Trump administration and other federal lawmakers. According to the document: "In the first eleven months of Trump's administration, the White House and Congress have closely followed The Network's Roadmap to Repeal, with Congress utilizing the Congressional Review Act more than any other time in its history. This year, thanks in part to its research and

outreach efforts across institutions, we have seen progress on many regulatory priorities this Network has championed for years." [[Koch Seminar Network Document](#) published by The Intercept, [2/25/2018](#)]

Trump's Interior Department Rescinded Obama's Limits On Fracking On Public Lands On The Last Business Day Of 2017. In December 2017, the Washington Post reported: "On the last business day of the year, the Interior Department rescinded a 2015 Obama administration rule that would have set new environmental limitations on hydraulic fracturing, or fracking, on public lands. The regulation from the Bureau of Land Management, which had been opposed by the oil and gas industry and tied up in court, would have tightened standards for well construction and wastewater management, required the disclosure of the chemicals contained in fracking fluids, and probably driven up the cost for many fracking activities." [Washington Post, [12/29/2017](#)]

EXITING THE PARIS CLIMATE AGREEMENT

The Koch Network Lobbied For Exiting The Paris Climate Agreement. In a Koch Network document obtained by the Intercept's Lee Fang, Koch Network operatives included "Withdraw the US from the Paris Climate Agreement" in a list of policy priorities for which they have lobbied the Trump administration and other federal lawmakers. According to the document: "In the first eleven months of Trump's administration, the White House and Congress have closely followed The Network's Roadmap to Repeal, with Congress utilizing the Congressional Review Act more than any other time in its history. This year, thanks in part to its research and outreach efforts across institutions, we have seen progress on many regulatory priorities this Network has championed for years." [[Koch Seminar Network Document](#) published by The Intercept, [2/25/2018](#)]

In November 2019, Trump Notified The United Nations That The U.S. Was Withdrawing From The Paris Climate Accord. According to the New York Times: "The Trump administration formally notified the United Nations on Monday that it would withdraw the United States from the Paris Agreement on climate change, leaving global climate diplomats to plot a way forward without the cooperation of the world's largest economy. The action, which came on the first day possible under the accord's complex rules on withdrawal, begins a yearlong countdown to the United States exit and a concerted effort to preserve the Paris Agreement, under which nearly 200 nations have pledged to cut greenhouse emissions and to help poor countries cope with the worst effects of an already warming planet." [[New York Times](#), [11/4/2019](#)]

SETTLING ENVIRONMENTAL LAWSUITS

The Koch Network Lobbied For EPA To Stop Settling Environmental Lawsuits.

In a Koch Network document obtained by the Intercept's Lee Fang, Koch Network operatives included "EPA 'sue and settle' practices" in a list of policy priorities for which they have lobbied the Trump administration and other federal lawmakers. According to the document: "In the first eleven months of Trump's administration, the White House and Congress have closely followed The Network's Roadmap to Repeal, with Congress utilizing the Congressional Review Act more than any other time in its history. This year, thanks in part to its research and outreach efforts across institutions, we have seen progress on many regulatory priorities this Network has championed for years." [[Koch Seminar Network Document](#) published by The Intercept, [2/25/2018](#)]

October 2017 Bloomberg Headline: "Trump's EPA To Curb Settlements With Environmentalists." In October 2017, Bloomberg reported: "The Trump administration moved Monday to curb settlements with conservationists and industry, instead vowing to fight cases designed to force the Environmental Protection Agency to take action. EPA Administrator Scott Pruitt said he is ending a "sue-and-settle" practice that has resulted in closed-door agreements committing the agency to regulating greenhouse gas emissions or mercury pollution from power plants." [Bloomberg, [10/16/2017](#)]

Harvard Environmental Law Review: Complaints Of 'Sue And Settle' Are "Mistaken" And "A War Of Words Relying On Emotionally Charged Rhetoric To Score Political Points." In a 2015 article published in the Harvard Environmental Law Review, a student and Assistant Professor at University of Denver Sturm College of Law wrote: "A primary complaint about environmental settlements is that they enable agencies to skirt or violate the constraints of administrative law. As this Article demonstrates, these complaints are mistaken. Environmental settlements fully conform to administrative law principles, and existing legal safeguards properly preclude collusion. This analysis reveals the current 'sue-and-settle' debate for what it is: a war of words relying on emotionally charged rhetoric to score political points." [Harvard Environmental Law Review, "ENVIRONMENTAL SETTLEMENTS AND ADMINISTRATIVE LAW," [04/12/2015](#)]

The Niskanen Center Called Pruitt's Argument Against Environmental Settlements "Nonsensical." In an October 2017 piece on the roll back of environmental settlements under Trump, the Niskanen Center's David Bookbinder wrote: "The idea that such settlements somehow circumvent 'due process' or 'the rule of law' is nonsensical." He explains, "Lawsuits

against the EPA can be divided into two baskets: purely procedural cases, where the EPA is sued in order to get it to do something Congress has told it to do, or substantive cases, which challenge EPA decisions. “Sue and settle” cases almost always fall into the first basket: Federal law requires the EPA to do something, but the agency has not done it.” [Niskanen Center, [10/20/2017](#)]

Reports Found That Environmental Groups Sued The EPA Almost Exclusively To Enforce Policy Action, But Over Half Of Lawsuits By Corporations Were To Change EPA Policy. In October 2017, Sierra Magazine reported that “In the U.S. Chamber’s report, 75 out of 79 settlements negotiated by environmental organizations were decision-forcing settlements. That is, the settlements compelled federal agencies to do their job when they badly missed the deadlines Congress set out in the Clean Air Act, Clean Water Act, and similar laws. These settlements enhance public participation, because members of the public would never have a chance to weigh in on matters affecting their health were the agency allowed to ignore statutory deadlines and bury problematic issues. In stark contrast, the Virginia Law Review analysis showed that industry settlements seek substantive decisions over 55 percent of the time. Those are the type of settlements that deprive the public of input.” They explain the difference as follows: “To understand the lies behind the false concept of “sue and settle,” one must understand the two main types of negotiated settlements in environmental law: decision-forcing settlements and substantive settlements. The first compels the government to make a decision—any decision—when action is long overdue; for example, EPA shall propose a rule by X date. The second compels the government to make a specific kind of decision; for example, that the water quality standard shall be X.” [Sierra Magazine, [10/18/2017](#)]

MEANWHILE, TRUMP HAS FAILED TO DELIVER FOR AMERICAN WORKERS

WHAT HE PROMISED

During The 2016 Campaign, Trump Said He Would Create 25 Million New Jobs. In September of 2016, Politico reported: “Donald Trump on Thursday fleshed out his campaign's economic plan, declaring in a speech at the New York Economic Club that it would deliver a jolt to the economy and create 25 million new jobs over the next decade. Over the next 10 years, our economic team estimates that under our plan the economy will average 3.5 percent growth and create a total of 25 million new jobs. You can visit our website, just look at the math, it works,” Trump told his lunchtime audience.” [[Politico, 9/15/2016](#)]

Trump Promised To Create 25 Million Jobs Over Ten Years. In January 2017, CNN reported: “He calls it the ‘America First’ doctrine. It's not just a slogan. The new president promises his plans will create 25 million new jobs in the next decade. It would be the most jobs created under any U.S. president ever, topping even the nearly 23 million jobs added under President Bill Clinton during the boom years of the 1990s.” [CNN, [1/30/2017](#)]

- **CNN Headline: “Trump Vows 25 Million Jobs, Most Of Any President.”** [CNN, [1/30/2017](#)]

WHERE THE U.S. STANDS

Nationally

January 2017 Total Nonfarm Employment: 145,672,000 Jobs. [Bureau of Labor Statistics, [January 2017 Report](#)]

January 2020 Total Nonfarm Employment: 152,212,000 Jobs. [Bureau of Labor Statistics, [January 2020 Report](#)]

June 2020 Total Nonfarm Employment: 137,802,000 Jobs. [Bureau of Labor Statistics, [June 2020 Report](#)]

The U.S. Economy Has Lost 7,870,000 Jobs Since Trump Took Office. According to the Bureau of Labor Statistics, seasonally adjusted total non-

farm payroll in the U.S. was 145,672,000 in January 2017, and 137,802,000 in their most recent estimate of June 2020. [Bureau of Labor Statistics, [January 2017 Report](#)]

The U.S. Economy Has Lost 14,410,000 Jobs Since January 2020. According to the Bureau of Labor Statistics, seasonally adjusted total non-farm payroll in the US was 145,672,000 in January 2017, and 137,802,000 in their most recent estimate of June 2020. [Bureau of Labor Statistics, [January 2017 Report](#)]

The U.S. Saw 45,770,000 Unemployment Claims During The COVID-19 Pandemic. According to the Department of Labor, 45,770,000 initial claims for unemployment insurance were made in the U.S. between the week of 3/21/20 (when unemployment claims began to spike), and the week of 6/13/20. [Department of Labor Office of Unemployment Insurance, accessed [7/14/20](#)]

The U.S. Lost 514,270 Clean Energy Jobs During The Economic Fallout Of The COVID-19 Pandemic. According to E2's report "Clean Energy Unemployment Claims in COVID-19 Aftermath, June 2020," as of July 2020 the US has lost 514,270 jobs in the clean energy sector. [E2, [7/10/20](#)]

Between Trump's Mishandling Of The Pandemic And His Attacks On Renewable Energy Policies, Trump Has Cost The Country More Than 1.1 Million Renewable Energy Jobs. [See our previous research document here.](#)

In Non-Recession Time, Obama Created More Jobs (8.1 Million) Than Trump Did (6.6 Million). According to a CNN analysis of BLS data, during the final 36 months of President Obama's administration, the US economy added 8.1 million jobs, while the economy added a mere 6.6 million jobs during the first 36 months of Trump's presidency. CNN chose these two periods to compare because they are the periods under each presidency when the country was not experiencing a recession. [CNN Business, [2/7/20](#)]

- **CNN: "There Are Hundreds Of Overlapping 36-Month Periods Of Better Growth On Record."** According to a CNN analysis of BLS data, Trump's record no jobs was before the onset of COVID-19 is unremarkable: "And Trump's job record is not unique. A gain of more than 6.6 million jobs during a 35-month period has been common during the 80 years that the Labor Department has counted jobs. There are hundreds of overlapping 36-month periods of better growth on record." [CNN Business, [2/7/20](#)]

Arizona

January 2017 Arizona Total Nonfarm Employment: 2,742,000 Jobs. [Bureau of Labor Statistics, [January 2017 Report](#)]

January 2020 Arizona Total Nonfarm Employment: 2,982,500. [Bureau of Labor Statistics, [January 2020 Report](#)]

June 2020 Arizona Total Nonfarm Employment: 2,756,000. [Bureau of Labor Statistics, [June 2020 Report](#)]

Arizona Has Lost 226,500 Jobs Since January 2020. According to the Bureau of Labor Statistics, seasonally adjusted total non-farm payroll in Arizona was : 2,982,500 in January 2020, and 2,756,000 in their most recent estimate of June 2020, for a difference of 226,500. [Bureau of Labor Statistics, [January 2017 Report](#)]

Arizona Saw 728,715 Unemployment Claims During The COVID-19 Pandemic. According to the Department of Labor, 728,715 initial claims for unemployment insurance were made in Arizona between the week of 3/21/20 (when unemployment claims began to spike), and the week of 6/13/20. [Department of Labor Office of Unemployment Insurance, accessed [7/14/20](#)]

Arizona Lost 7,837 Clean Energy Jobs During The Economic Fallout Of The COVID-19 Pandemic. According to E2's report "Clean Energy Unemployment Claims in COVID-19 Aftermath, June 2020," as of July 2020 Arizona has lost 7,837 jobs in the clean energy sector to the COVID-19 recession. [E2, [7/10/20](#)]

Colorado

January 2017 Colorado Total Nonfarm Employment: 2,627,700. [Bureau of Labor Statistics, [January 2017 Report](#)]

January 2020 Colorado Total Nonfarm Employment: 2,813,800. [Bureau of Labor Statistics, [January 2020 Report](#)]

June 2020 Colorado Total Nonfarm Employment: 2,539,900. [Bureau of Labor Statistics, [June 2020 Report](#)]

Colorado Has Lost 87,800 Jobs Since Trump Took Office. According to the Bureau of Labor Statistics, seasonally adjusted total non-farm payroll in Colorado was 2,627,700 in January 2017, and 2,539,900 in their most recent estimate of June 2020, for a difference of 87,800. [Bureau of Labor Statistics, [January 2017 Report](#)]

Colorado Has Lost 273,900 Jobs Since January 2020. According to the Bureau of Labor Statistics, seasonally adjusted total non-farm payroll in Colorado was 2,813,800 in January 2020, and 2,539,900 in their most recent estimate of June 2020, for a difference of 273,900. [Bureau of Labor Statistics, [January 2017 Report](#)]

Colorado Saw 478,334 Unemployment Claims During The COVID-19 Pandemic. According to the Department of Labor, 478,334 initial claims for unemployment insurance were made in Colorado between the week of 3/21/20 (when unemployment claims began to spike), and the week of 6/13/20. [Department of Labor Office of Unemployment Insurance, accessed [7/14/20](#)]

Colorado Lost 6,065 Clean Energy Jobs During The Economic Fallout Of The COVID-19 Pandemic. According to E2's report "Clean Energy Unemployment Claims in COVID-19 Aftermath, June 2020," as of July 2020 Colorado has lost 6,065 jobs in the clean energy sector to the COVID-19 recession. [E2, [7/10/20](#)]

Florida

January 2017 Florida Total Nonfarm Employment: 8,515,600. [Bureau of Labor Statistics, [January 2017 Report](#)]

January 2020 Florida Total Nonfarm Employment: 9,068,800. [Bureau of Labor Statistics, [January 2020 Report](#)]

June 2020 Florida Total Nonfarm Employment: 8,076,400. [Bureau of Labor Statistics, [June 2020 Report](#)]

Florida Has Lost 439,200 Jobs Since Trump Took Office. According to the Bureau of Labor Statistics, seasonally adjusted total non-farm payroll in Florida was 8,515,600 in January 2017, and 8,076,400 in their most recent estimate of June 2020, for a difference of 439,200. [Bureau of Labor Statistics, [January 2017 Report](#)]

Florida Has Lost 992,400 Jobs Since January 2020. According to the Bureau of Labor Statistics, seasonally adjusted total non-farm payroll in Florida was 9,068,800 in January 2020, and 8,076,400 in their most recent estimate of June 2020, for a difference of 992,400. [Bureau of Labor Statistics, [January 2017 Report](#)]

Florida Saw Nearly 3 Million Unemployment Claims During The COVID-19 Pandemic. According to the Department of Labor, 2,979,700 initial claims for unemployment insurance were made in Florida between the week of 3/21/20 (when unemployment claims began to spike), and the week of

6/13/20. [Department of Labor Office of Unemployment Insurance, accessed [7/14/20](#)]

Florida Lost 26,643 Clean Energy Jobs During The Economic Fallout Of The COVID-19 Pandemic. According to E2's report "Clean Energy Unemployment Claims in COVID-19 Aftermath, June 2020," as of July 2020 Florida has lost 26,643 jobs in the clean energy sector to the COVID-19 recession. [E2, [7/10/20](#)]

Georgia

January 2017 Georgia Total Nonfarm Employment: 4,416,100. [Bureau of Labor Statistics, [January 2017 Report](#)]

January 2020 Georgia Total Nonfarm Employment: 4,651,300. [Bureau of Labor Statistics, [January 2020 Report](#)]

June 2020 Georgia Total Nonfarm Employment: 4,200,100. [Bureau of Labor Statistics, [June 2020 Report](#)]

Georgia Has Lost 216,000 Jobs Since Trump Took Office. According to the Bureau of Labor Statistics, seasonally adjusted total non-farm payroll in Georgia was 4,416,100 in January 2017, and 4,200,100 in their most recent estimate of June 2020, for a difference of 216,000. [Bureau of Labor Statistics, [January 2017 Report](#)]

Georgia Has Lost 451,200 Jobs Since January 2020. According to the Bureau of Labor Statistics, seasonally adjusted total non-farm payroll in Georgia was 4,651,300 in January 2020, and 4,200,100 in their most recent estimate of June 2020, for a difference of 451,200. [Bureau of Labor Statistics, [January 2017 Report](#)]

Georgia Saw Nearly 3 Million Unemployment Claims During The COVID-19 Pandemic. According to the Department of Labor, 2,843,219 initial claims for unemployment insurance were made in Georgia between the week of 3/21/20 (when unemployment claims began to spike), and the week of 6/13/20. [Department of Labor Office of Unemployment Insurance, accessed [7/14/20](#)]

Georgia Lost 27,353 Clean Energy Jobs During The Economic Fallout Of The COVID-19 Pandemic. According to E2's report "Clean Energy Unemployment Claims in COVID-19 Aftermath, June 2020," as of July 2020 Georgia has lost 27,353 jobs in the clean energy sector to the COVID-19 recession. [E2, [7/10/20](#)]

Michigan

January 2017 Michigan Total Nonfarm Employment: 4,355,900. [Bureau of Labor Statistics, [January 2017 Report](#)]

January 2020 Michigan Total Nonfarm Employment: 4,450,600. [Bureau of Labor Statistics, [January 2020 Report](#)]

June 2020 Michigan Total Nonfarm Employment: 3,579,300. [Bureau of Labor Statistics, [June 2020 Report](#)]

Michigan Has Lost 776,600 Jobs Since Trump Took Office. According to the Bureau of Labor Statistics, seasonally adjusted total non-farm payroll in Michigan was 4,355,900 in January 2017, and 3,579,300 in their most recent estimate of June 2020, for a difference of 776,600. [Bureau of Labor Statistics, [January 2017 Report](#)]

Michigan Has Lost 451,200 Jobs Since January 2020. According to the Bureau of Labor Statistics, seasonally adjusted total non-farm payroll in Michigan was 4,450,600 in January 2020, and 3,579,300 in their most recent estimate of June 2020, for a difference of 451,200. [Bureau of Labor Statistics, [January 2017 Report](#)]

Michigan Saw More Than 1.5 Million Unemployment Claims During The COVID-19 Pandemic. According to the Department of Labor, 1,652,036 initial claims for unemployment insurance were made in Michigan between the week of 3/21/20 (when unemployment claims began to spike), and the week of 6/13/20. [Department of Labor Office of Unemployment Insurance, accessed [7/14/20](#)]

Michigan Lost 24,659 Clean Energy Jobs During The Economic Fallout Of The COVID-19 Pandemic. According to E2's report "Clean Energy Unemployment Claims in COVID-19 Aftermath, June 2020," as of July 2020 Michigan has lost 24,659 jobs in the clean energy sector to the COVID-19 recession. [E2, [7/10/20](#)]

North Carolina

January 2017 North Carolina Total Nonfarm Employment: 4,376,900. [Bureau of Labor Statistics, [January 2017 Report](#)]

January 2020 North Carolina Total Nonfarm Employment: 4,608,700. [Bureau of Labor Statistics, [January 2020 Report](#)]

June 2020 North Carolina Total Nonfarm Employment: 4,063,300. [Bureau of Labor Statistics, [June 2020 Report](#)]

North Carolina Has Lost 313,600 Jobs Since Trump Took Office. According to the Bureau of Labor Statistics, seasonally adjusted total non-farm payroll in North Carolina was 4,376,900 in January 2017, and 4,063,300 in their most recent estimate of June 2020, for a difference of 313,600. [Bureau of Labor Statistics, [January 2017 Report](#)]

North Carolina Has Lost 545,400 Jobs Since January 2020. According to the Bureau of Labor Statistics, seasonally adjusted total non-farm payroll in North Carolina was 4,608,700 in January 2020, and 4,063,300 in their most recent estimate of June 2020, for a difference of 545,400. [Bureau of Labor Statistics, [January 2017 Report](#)]

North Carolina Saw More Than 1 Million Unemployment Claims During The COVID-19 Pandemic. According to the Department of Labor, 1,145,316 initial claims for unemployment insurance were made in North Carolina between the week of 3/21/20 (when unemployment claims began to spike), and the week of 6/13/20. [Department of Labor Office of Unemployment Insurance, accessed [7/14/20](#)]

North Carolina Lost 21,380 Clean Energy Jobs During The Economic Fallout Of The COVID-19 Pandemic. According to E2's report "Clean Energy Unemployment Claims in COVID-19 Aftermath, June 2020," as of July 2020 North Carolina has lost 21,380 jobs in the clean energy sector to the COVID-19 recession. [E2, [7/10/20](#)]

Pennsylvania

January 2017 Pennsylvania Total Nonfarm Employment: 5,916,400. [Bureau of Labor Statistics, [January 2017 Report](#)]

January 2020 Pennsylvania Total Nonfarm Employment: 6,096,600. [Bureau of Labor Statistics, [January 2020 Report](#)]

June 2020 Pennsylvania Total Nonfarm Employment: 5,191,400. [Bureau of Labor Statistics, [June 2020 Report](#)]

Pennsylvania Has Lost 725,000 Jobs Since Trump Took Office. According to the Bureau of Labor Statistics, seasonally adjusted total non-farm payroll in Pennsylvania was 5,916,400 in January 2017, and 5,191,400 in their most recent estimate of June 2020, for a difference of 725,000. [Bureau of Labor Statistics, [January 2017 Report](#)]

Pennsylvania Has Lost 905,200 Jobs Since January 2020. According to the Bureau of Labor Statistics, seasonally adjusted total non-farm payroll in Pennsylvania was 6,096,600 in January 2020, and 5,191,400 in their most

recent estimate of June 2020, for a difference of 905,200. [Bureau of Labor Statistics, [January 2017 Report](#)]

Pennsylvania Saw Almost 2 Million Unemployment Claims During The COVID-19 Pandemic. According to the Department of Labor, 1,902,722 initial claims for unemployment insurance were made in Pennsylvania between the week of 3/21/20 (when unemployment claims began to spike), and the week of 6/13/20. [Department of Labor Office of Unemployment Insurance, accessed [7/14/20](#)]

Pennsylvania Lost 18,945 Clean Energy Jobs During The Economic Fallout Of The COVID-19 Pandemic. According to E2's report "Clean Energy Unemployment Claims in COVID-19 Aftermath, June 2020," as of July 2020 Pennsylvania has lost 18,945 jobs in the clean energy sector to the COVID-19 recession. [E2, [7/10/20](#)]

Wisconsin

January 2017 Wisconsin Total Nonfarm Employment: 2,937,100. [Bureau of Labor Statistics, [January 2017 Report](#)]

January 2020 Wisconsin Total Nonfarm Employment: 2,993,100. [Bureau of Labor Statistics, [January 2020 Report](#)]

June 2020 Wisconsin Total Nonfarm Employment: 2,593,000. [Bureau of Labor Statistics, [June 2020 Report](#)]

Wisconsin Has Lost 344,100 Jobs Since Trump Took Office. According to the Bureau of Labor Statistics, seasonally adjusted total non-farm payroll in Wisconsin was 2,937,100 in January 2017, and 2,593,000 in their most recent estimate of June 2020, for a difference of 344,100. [Bureau of Labor Statistics, [January 2017 Report](#)]

Wisconsin Has Lost 400,100 Jobs Since January 2020. According to the Bureau of Labor Statistics, seasonally adjusted total non-farm payroll in Wisconsin was 2,993,100 in January 2020, and 2,593,000 in their most recent estimate of June 2020, for a difference of 400,100. [Bureau of Labor Statistics, [January 2017 Report](#)]

Wisconsin Saw 705,117 Unemployment Claims During The COVID-19 Pandemic. According to the Department of Labor, 705,117 initial claims for unemployment insurance were made in Wisconsin between the week of 3/21/20 (when unemployment claims began to spike), and the week of 6/13/20. [Department of Labor Office of Unemployment Insurance, accessed [7/14/20](#)]

Wisconsin Lost 8,974 Clean Energy Jobs During The Economic Fallout Of The COVID-19 Pandemic. According to E2's report "Clean Energy Unemployment Claims in COVID-19 Aftermath, June 2020," as of July 2020 Wisconsin has lost 8,974 jobs in the clean energy sector to the COVID-19 recession. [E2, [7/10/20](#)]