On behalf of NRDC’s three million members and supporters, I want to register strong opposition to the Trump administration’s destructive and unpopular agenda of rolling back public health and environmental safeguards under the Clean Air Act and our other bedrock environmental laws.

We have a shared moral obligation to provide clean air and a safe, healthy climate for future generations. But I don’t rest my case there. I challenge President Trump or Administrator Pruitt to find a public investment with a better rate of return for the American people than the Clean Air Act.

**Health and Environmental Benefits**

The Clean Air Act prevents more than 160,000 premature deaths and 1.7 million asthma attacks each year.

Over its nearly 50 year history, the Clean Air Act has saved literally millions of lives, and averted tens of millions serious illnesses, from heart attacks to asthma attacks.

The Clean Air Act has prevented environmental catastrophes ranging from the loss of lakes and forests to acid rain, massive ozone-induced crop and forest damage, to destruction of the ozone layer.

Thousands of lives have been saved by EPA’s radon monitoring and testing rules.

Taking lead out of gasoline protected millions of kids from brain damage. Countries across the globe have followed our leadership and improved billions of peoples’ lives.

**Economic Returns**

In purely economic terms, it is air pollution that is a job killer. Without the Clean Air Act, American workers would lose 13 million more work days to illness every year. Over the last five decades, the Clean Air Act has avoided tens of millions of work days lost for adults, and tens of millions of school days lost for children.

Unrestrained acid rain, crop and forest damage, and ozone layer destruction would have wreaked massive damage on the economy.

Charges that blame the Clean Air Act for hurting our economy have no factual foundation. Our economy has tripled in size since 1970 while we’ve cut certain dangerous air pollutants by from 65 to 100 percent.
The Clean Air Act delivers up to $90 in public health benefits for every dollar invested in curbing pollution. As I said, there is no public investment with a better rate of return.

**The Job Is Not Done**

But the job is not done. Fine particles, ozone, air toxins, heat-trapping pollutants, radioactive substances, and more still cause huge damage to public health, our economy, and the climate system on which our economy and well-being literally depends.

EPA should be moving forward, not rolling back.

Just four examples of regulations now under attack that EPA should be implementing and strengthening, not rolling back:

- **The Clean Power Plan** is the most significant step the U.S. has taken to address the urgent threat of climate change. It would prevent up to 3,600 premature deaths, 1,700 heart attacks, 90,000 asthma attacks, and 300,000 missed workdays and schooldays in 2030. It would deliver up to $54 billion per year in combined climate and health benefits, far outweighing compliance costs of $5 to $8 billion per year. It encourages more job-creating growth in the booming clean energy industry. More than 2.5 million Americans already work in clean energy, triple the number in the coal, oil, and gas industries.

- **EPA’s Clean Car and Truck Standards** have already avoided 160 million metric tons of carbon pollution while saving consumers more than $35 billion at the gas pump. There is no basis for weakening the 2022-25 standards or for abrogating California’s standards.

- **EPA’s Mercury and Air Toxics Standards** – standards industry has already met – are saving up to 11,000 lives and avoiding 130,000 asthma attacks, mostly among children, every year.

- **EPA’s Methane Standards** curb massive methane leakage from oil and gas operations, our second largest industrial contributor to climate change, while also cutting hundreds of thousands of tons of smog-producing and toxic pollutants. EPA should be moving forward with standards for existing sources, not rolling back standards for new sources. Every year, $2 billion worth of natural gas is wasted – we should make sure that if we extract natural gas, we actually use it.

**The Trump/Pruitt “Back2Pollution” Agenda Is Deeply Unpopular**

Americans did not vote to roll back clean air, clean energy, and climate safeguards

Polls show that strong majorities—including majorities of Trump voters—want to keep or strengthen clean air, water, and climate safeguards and energy efficiency measures.

Here are data points from recent polls:
**Politico-Morning Consult, April 13-15, 2017**

- 54% of Americans give President Trump a “D” or an “F” on climate change – same score as on health care.

**CNBC, April 3-6, 2017**

- By 52-32%, Americans oppose “rolling back Obama-era regulations that address climate change.”
- That is *the most unpopular* of nine Trump administration priorities polled.

**Gallup, March 14, 2017**:

- “Record percentages of Americans are concerned about global warming, believe it is occurring, consider it a serious threat and say it is caused by human activity. All of these perceptions are up significantly from 2015.”
- Two-thirds of Americans say they are worried a "great deal" or "fair amount" about global warming. 45% worry a “great deal”—up from 37% a year ago.

**Quinnipiac, Feb. 8, 2017**:

- By 61 to 29%, Americans oppose Trump’s removing specific regulations intended to combat climate change.
- 72% of Americans are concerned about climate change, and 59% say the U.S. should be doing more to combat climate change.

**Glover Park Group/Morning Consult, December 2016 survey of 2000 Trump voters**:

- 61% of Trump voters support requiring US companies to reduce carbon emissions, vs. 28% opposed.
- 55% of Trump voters want to keep or strengthen current climate change policies, vs. 30% who want to “roll back” those policies.
- 84% of Trump voters want the same or more federal regulations on drinking water and 78% want the same or more federal regulations on air pollution.
- 76% of Trump voters support requiring manufacturers to make appliances more energy efficient.

**The “Regulatory Reform” Process Is A Sham**

The “regulatory reform” process that EPA is now running is a sham.

You are cramming public input on clean air into a three-hour teleconference run out of Washington.
By contrast, EPA held literally hundreds of stakeholder meetings, and public hearings in multiple cities, over the course of three years to get all sides’ input into just one regulation, the Clean Power Plan.

EPA needs to abandon this rollback process and get back to doing its job. And in doing its job, EPA needs to provide real opportunities for input by all the agency’s stakeholders – the public as well as the polluters. EPA should hold face-to-face public hearings in multiple cities, not just one-off teleconferences and meetings with limited access here in the swamp in Washington.

The “Back2Basics” course that Administrator Pruitt has charted is a “Back2Pollution” detour 180 degrees off from EPA’s statutory mission and obligations. It is legally and morally wrong, and it is deeply unpopular. The Administrator must return to EPA’s actual mission: to protect all Americans who breathe air, drink the water, and feel the heat.