

I wish I could do it all over again! I have had the most wonderful 40 years working in environmental protection. Over those years, I have worked for a private consulting firm, local government, state government and finally EPA's Water and Superfund programs. In every one of those organizations, I had the privilege of working with dedicated professionals from many different fields. These are people who first spent years studying science, engineering, economics, and statistics and then spent years on the job assessing the public health and ecological impacts of pollution, identifying the causes of those impacts, and devising fixes. During my 40 years working on environmental protection, our country has made enormous strides preventing and remediating pollution, led by those highly trained professionals who work alongside local communities, states, companies and the general public.

It's hard to believe, but as recently as 30 years ago, Nonpoint Sources of Pollution were considered to be a hoax and fake news in many states. It has only been about 30 years since Congress enacted the Superfund laws that require industries to take responsibility for cleaning up toxic pollution in the environment. Finally, it has only been about 20 years since drinking water utilities began installing new treatment processes to manage carcinogenic disinfection byproducts and microbial contaminants like Cryptosporidium.

So, looking back over my 40-year career in environmental protection, what jumps out is that sooner or later, requirements and practices for the "right thing" for the environment take hold and the claims of "hoax" and "fake news" fall by the wayside. And EPA has been the guiding light to make the "right thing" happen for the greater good, including public health and safety and, without being melodramatic, for our country's fair share of protection for the planet

In his first address to EPA staff, the new Administrator admonished us for acting outside legal mandates and running roughshod over states' rights. The Administrator subsequently assured the states that he will initiate a cooperative federalism approach in which the power to govern is finally shared between EPA and the states. In fact, EPA has always followed a cooperative federalism approach since most environmental programs are delegated to states and tribes who carry out the majority of monitoring, permitting, inspections, and enforcement actions. All the federal environmental statutes set national standards for protection of public health and the environment because Congress recognized that some states might be willing, for economic or other reasons, to tolerate much less protection than their neighboring states. To ensure that all states can provide clean air and water not only to their own residents but to the residents of downwind/downstream states, EPA provides funding to states and tribes to support their implementation of the federal statutes. Under the new federalism, however, the President's FY18 budget proposes cuts to state and tribal funding as draconian as the cuts to EPA, while at the same time reassigning a number of EPA responsibilities to the states and tribes. If they want to maintain their current level of monitoring, permitting,

inspections, and enforcement, states will have to increase taxes and establish new user fees. Even if they are able to do this over time, the proposed FY18 budget cuts to state, tribal and federal environmental programs would result in thousands of jobs lost in the short term, in EPA, state and tribal governments, and the private environmental consulting firms which support those governmental agencies.

In addition to defunding implementation of existing environmental regulations at the local, state and federal level, the President goes further by requiring that any new regulation be accompanied by repeal of two existing regulations of equal or greater cost. To implement this "regulation trading" program, EPA will have to choose which Congressional law to ignore, and face litigation through costly citizen suits. This poses a real Sophie's choice for public health agencies like EPA. Should EPA repeal two existing rules protecting infants from neurotoxins in order to promulgate a new rule protecting adults from a newly discovered liver toxin? Faced with such painful choices, the best possible outcome for the American people would be regulatory paralysis where no new rules are released so that existing protections remain in place.

Unfortunately, even existing protections will not remain in place since the administration has also launched a repeal, replace, modify initiative which is not tied to issuing new rules. Any environmental protection rule promulgated at any time in the past may be repealed by this administration, as well as any science or technical document ever published by EPA. The new EPA Administrator already has repeals of 30 rules under consideration, one of which is the steam electric rule promulgated in 2015 after EPA spent years collecting data on power plants, millions of dollars conducting engineering and economic analyses of those data, and months responding to extensive public comment. The final rule required for the first time that the highly toxic wastes of coal fired electric plants be treated rather than poured untreated into large holding ponds where the toxic chemicals seep into ground water and overflow into surface water, contaminating public water supplies and private wells and poisoning fish and wildlife. The objective of the 2015 rule is to prevent repeats of the many environmental catastrophes caused by the failure of power company coal ash ponds, the most recent being the 70 mile long Duke Energy spill into the Dan River of North Carolina.

The major budget cuts to EPA, state and tribal environmental programs and the potential repeal of many existing regulations and science documents is not a cooperative federalism approach. It is an industry deregulation approach based on abandonment of the polluter pays principle that underlies all environmental statutes and regulations. When the federal government abandons the polluter pays principle, it will be up to the states, tribes and local government to decide how much of the polluters bills they will ask their residents to take on. The best case for our children and grandchildren is that they will pay the polluters bills through increased state taxes, new user fees, and higher water and sewer bills. The worst case is that they will have to live

with increased public health and safety risks and a degraded environment. Environmental catastrophes have often occurred when there was a decision to roll the dice and achieve a short term gain at the risk of disastrous long term costs --- Hurricane Katrina where small savings in flood protection levees resulted in one of the most catastrophic flooding and environmental disasters in U.S. history and Flint, Michigan where minimal costs for corrosion control or an alternative water supply were dwarfed by the subsequent lead contamination of children..

Today the environmental field is suffering from the temporary triumph of myth over truth. The truth is there is NO war on coal, there is NO economic crisis caused by environmental protection, and climate change IS caused by man's activities. It may take a few years and even an environmental disaster, but I am confident that Congress and the courts will eventually restore all the environmental protections repealed by this administration because the majority of the American people recognize that this protection of public health and safety is right and it is just.

Thanks to all of you for your hard work and professionalism. It has been a joy to work with you, and I wish you all the best.