Energy and Environmental Policy Under a Second Trump Administration

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Addressing Policy Shifts Under a Second Trump Administration

- As we look ahead to a new political landscape, join us for a series of webinars that offer insights into key regulatory and policy changes expected under a second Trump presidency.
- We'll explore how leadership transitions, executive actions, and congressional dynamics will shape the future of industries ranging from healthcare and financial services to energy, trade, and beyond.
- Each session will feature analysis from Venable attorneys and senior policy advisors, providing actionable guidance on how businesses and organizations can navigate evolving circumstances. Join us for a comprehensive look at the changes coming to Washington.

Navigating a Shifting Energy Landscape

- America faces rising energy demand, grid strain, and geopolitical risks.
- Administration priorities include oil and gas expansion, deregulation, energy security, and permitting reform.
- Evolving technology continues to open new methods of energy production and storage.
- Clean energy investments face uncertainty amid spending cuts and regulatory rollbacks.
- Implementing the changes called for by the Administration’s Executive Orders will be the big challenge.

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Navigating a Shifting Environmental Law Landscape

- Difficult to overstate the breadth of changes to and reversals of environmental policy.
- Despite spate of executive orders, the other environmental regulatory shoe is yet to drop.
- Other administrative actions (funding freezes/claw backs, staffing cuts/reassignments, state oversight) will have a tremendous impact on environmental policy.
- Congress will have its say, through the Congressional Review Act and other initiatives.
- Litigation, litigation, litigation.

Energy Demand Drivers and Trends

- **Electricity Demand:** Projected 15.8% growth by 2029, reversing decades of stability.
- **Data Centers and AI:** Hyperscale data center demand could reach 440 TWh annually by 2035.
- **Electrification:** EVs and heat pumps contributing to 3-4% annual demand growth.
- **Extreme Heat:** Climate-driven cooling demand increasing peak loads.

Goals of Trump Administration Actions on Energy

- Rescinding existing and limiting new regulations that interfere with the development of domestic energy sources.
- Opening additional American territory for energy and mineral extraction.
- Imposing tariffs on foreign energy imports in order to protect and foster domestic energy development.
- Exerting additional authority over regulatory agencies, including independent agencies, to ensure that agency action is consistent with Trump administration policies.
- Eliminating prior orders and regulations concerning implementation of the Inflation Reduction Act (IRA) and the Bipartisan Infrastructure Law, especially those concerning the development and subsidization of the clean energy industry.

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Executive Orders Impacting Energy Development and Regulation

- Unleashing American Energy (E.O. 14154)
- Rescinding Biden Orders (E.O. 14158)
- National Energy Emergency (E.O. 14156)
- National Energy Dominance Council (E.O. 14213)
- Tariffs (E.O. 14193, E.O. 14194, E.O. 14197, and E.O. 14198)
- Oversight of Independent Regulatory Agencies (E.O. 14215)
- Deregulatory Orders
  - 10 for 1 Rule (E.O. 14192)
  - Regulatory Review (E.O. 14219)

New Priorities: Unleashing American Energy, National Energy Emergency, and the National Energy Dominance Council

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Unleashing American Energy

Executive Order 14154 (Jan. 20, 2025)

- On January 20, President Trump issued an **executive order** that sets forth the administration's plan to "unleash America's affordable and reliable energy and natural resources."
- According to the E.O., it is the policy of the administration to:
  - "Encourage energy exploration and production on Federal lands and waters, including on the Outer Continental Shelf."
  - "Establish the country's position as the leading producer and processor of non-fuel minerals."
  - "Protect the economic security, national security and military preparedness by ensuring an abundant supply of reliable energy."
  - "Ensure that all regulatory requirements related to energy are grounded in clearly applicable law."
  - "Eliminate the electric vehicle (EV) mandate."

Unleashing American Energy

Executive Order 14154 (Jan. 20, 2025)

- Within 30 days of the executive order, agencies must develop a plan to suspend, revise, or rescind all agency actions, including existing regulations, orders, and guidance, that unduly burden the identification, development, or use of domestic energy resources, especially oil, natural gas, coal, hydropower, biofuel, critical mineral, and nuclear energy resources.

- Agency heads must eliminate delays with respect to permitting and expedite projects deemed essential to the nation's economy or security.

- Directs DOE to restart review of LNG export applications and to identify all agency actions that impose undue burdens on domestic mining.

- Directs EPA to look at the use of the "social cost of carbon" within 60 days and consider eliminating it from any Federal permitting or regulatory decision.

- There are several provisions directed at "Restoring America's Mineral Dominance" in mining and processing non-fuel minerals.

Clean Energy Initiatives After the Executive Orders

- Unleashing American Energy paused the release of DOE loans and grants appropriated under the Inflation Reduction Act and the Infrastructure and Jobs Act.
  - Federal district courts have granted TROs on the administration's broad funding freeze, but it appears that many programs remain unfunded. On Feb. 12, the DOE disbursed the first advance on a loan since the start of the administration.
- Funding and incentives for climate, energy efficiency, and clean energy are among those expenditures that the administration aims to eliminate.
- Among other projects, the administration has frozen payments for:
  - Grants for electric vehicle charging infrastructure
  - Residential solar programs
  - Rebates for energy-efficient appliances
  - Loans for the construction of lithium-ion battery plants and a recommissioned nuclear plant

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Rescissions of Existing Executive Orders

Exec. Orders 14154 & 14148

- President Trump rescinded several Biden administration regulatory actions through EOs 14154 and **Initial Rescissions of Harmful Executive Orders And Actions**, Exec. Order 14148 (Jan. 20, 2025). Rescinded regulations include:
  - Implementation of the Energy and Infrastructure Provisions of the Inflation Reduction Act, EO 14082 (Dec. 8, 2021)
  - Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability, EO 14057 (Dec. 8, 2021)
  - Tackling the Climate Crisis at Home and Abroad, EO 14008 (Jan. 27, 2021)
  - Withdrawal of Certain Areas off the United States Arctic Coast of the Outer Continental Shelf from Oil or Gas Leasing, Presidential Memorandum of March 13, 2023

  These rescissions seek to eliminate funding and tax credits that supported the Biden administration's climate change, clean energy, and renewable policies.

- EO 14154 also rescinded **Protection and Enhancement of Environmental Quality,** Exec. Order 11514 (Mar. 7, 1970), which was the authority for CEQ regulations implementing National Environmental Policy Act (NEPA) Review.
  - The EO directs federal agencies to revise their NEPA implementing procedures (or establish new procedures if they do not have any) to expedite permitting approvals.

Declaring a National Energy Emergency

Exec. Order 14156 (Jan. 20, 2025)

- This **E.O.** invokes the President's authority under the National Emergencies Act to declare a national energy emergency.
  - Executive departments and agencies must "identify and exercise any lawful emergency authorities available . . . to facilitate the identification, leasing, siting, production, transportation, refining, and generation of domestic energy resources, including, but not limited to, on federal lands."
- President Trump ordered the EPA and DOE to consider issuing emergency fuel waivers to allow the year-round sale of E15 gasoline to meet any projected temporary shortfalls in the supply of gasoline.
- Agencies will identify actions that may require emergency permitting under the Clean Water Act.
- Directs DOD to assess the ability to acquire and transport energy, electricity, and fuel at home and abroad.

Establishing the National Energy Dominance Council

Exec. Order 14213 (Feb. 14, 2025)

- This **E.O.** creates a Council composed of the heads of various agencies that will advise the President on how to "expand all forms of reliable and affordable energy production."
- The Secretary of the Interior will serve as chair of the Council, and the Secretary of Energy will be vice chair.
- The Council will consist of thirteen members and "heads of such other executive departments and agencies as the President may, from time to time, designate."
  - The heads of the following departments are members of the Council: State, Treasury, Defense, Agriculture, Commerce, Transportation, DOJ, and the EPA.
  - Additionally, the director of OMB, the United States Trade Representative, chair of the Council on Environmental Quality, chair of the Council of Economic Advisers, the director of OSTP, and assistants to the President for Economic Policy and National Security Affairs are also members.
  - The President may designate other "heads of such other executive departments and agencies" to serve on the Council.

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Establishing the National Energy Dominance Council

Exec. Order 14213 (Feb. 14, 2025)

- The Council will advise the President on "how best to exercise his authority to produce more energy to make America energy dominant" and how to "improv[e] the processes for permitting, production, generation, distribution, regulation, transportation, and export of all forms of American energy, including critical minerals."
- Provide a "National Energy Dominance Strategy" that "includes long-range goals for achieving energy dominance by cutting red tape, enhancing private sector investments[,] . . . focusing on innovation, and seeking to eliminate longstanding, but unnecessary, regulation."
- Facilitate consistency in energy production policies to meet these goals.
- Facilitate cooperation between the federal government and private sector energy partners.
- Within 100 days of the EO, the Council must recommend "a plan to raise awareness on a national level of matters related to energy dominance." This will include the technological improvements and jobs it creates, its importance to national security, and the "regulatory constraints driving up the cost of reliable energy."
    - The Council will review energy markets, recommend incentives to attract and retain private sector energy-production investments, and identify and end practices that raise the cost of energy.

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Tariffs
Executive Orders 14193 (Feb. 1, 2025), 14194 (Feb. 1, 2023), 14197 (Feb. 3, 2025), and 14198 (Feb. 3, 2025)

Tariffs on Canada and Mexico

Exec. Orders 14193, 14194, 14197, & 14198

- On February 1, President Trump issued EOs imposing tariffs on Canada and Mexico, then paused both shortly thereafter.
- President Trump imposed a 25% tariff on "all articles that are products of Canada," ***except for energy or energy resources***, which have a 10% tariff. **Exec. Order 14193** (Feb. 1, 2025).
  - As of February 3, this tariff has been paused for 30 days. **Exec. Order 14197** (Feb. 3, 2025).
- President Trump imposed a 25% tariff on "all articles that are products of Mexico." **Exec. Order 14194** (Feb. 1, 2025).
  - This tariff has been paused until March 4, 2025 to assess whether the government of Mexico has taken sufficient action to abate the threat of drugs and immigration. **Exec. Order 14198** (Feb. 3, 2025).
- Both executive orders were nominally in response to the threats of "drug trafficking" and "illegal immigration," but they both exhibit a more protectionist trade policy from the administration.

A New Regulatory Approach: Executive Authority and Deregulation

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Ensuring Accountability for All Agencies

Exec. Order 14215 (Feb. 18, 2025)

- This **E.O.** states that "previous administrations" have undermined agencies' "accountability to the American people" by "allow[ing] so-called independent regulatory agencies to operate with minimal supervision."
- Requires independent regulatory agencies, like FERC and NRC, to coordinate policies and priorities with OMB and the White House.
- These agencies must now submit all significant regulatory actions to the Office of Information and Regulatory Affairs before publication in the *Federal Register*.
- The Attorney General's "opinions on questions of law are controlling on all employees in the conduct of their official duties." An executive branch employee cannot "advance an interpretation of the law as the position of the United States that contravenes the President or the Attorney General's opinion on a matter of law, including but not limited to the issuance of regulations, guidance, and positions advanced in litigation."

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Ensuring Lawful Governance and Implementing the President's Department of Government Efficiency Deregulatory Initiative

Exec. Order 14219 (Feb. 19, 2025)

- This **E.O.** was issued on February 19, 2025.
- Within 60 days, agency heads must conduct a review of applicable regulations and identify several classes of regulations, including:
  - Unconstitutional regulations,
  - Regulations based on unlawful delegation of legislative power,
  - Regulations based on anything other than the best reading of statutory authority,
  - Regulations implicating matters of social, political, or economic significance that are not authorized by clear statutory authority,
  - Regulations that impose significant costs upon private parties that do not outweigh benefits,
  - Regulations that harm the national interest, and
  - Regulations that impose undue burdens on small business.

Unleashing Prosperity Through Deregulation

Exec. Order 14192 (Jan. 31, 2025)

- Similar to the first Trump administration's two-for-one rule, this **E.O.** requires agencies to eliminate ten prior regulations for each regulation promulgated.
- Further guidance from OMB will clarify if this rule will apply to independent regulatory agencies.
- In the previous two-to-one rule, OMB used EO 12866's definition of "agency," which did not include independent regulatory agencies. The Accountability for All Agencies EO changes that definition for purposes of EO 12866 review; further OMB guidance may clarify its application to the ten-to-one order.

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The Approach in Action: Early Results

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Department of Energy

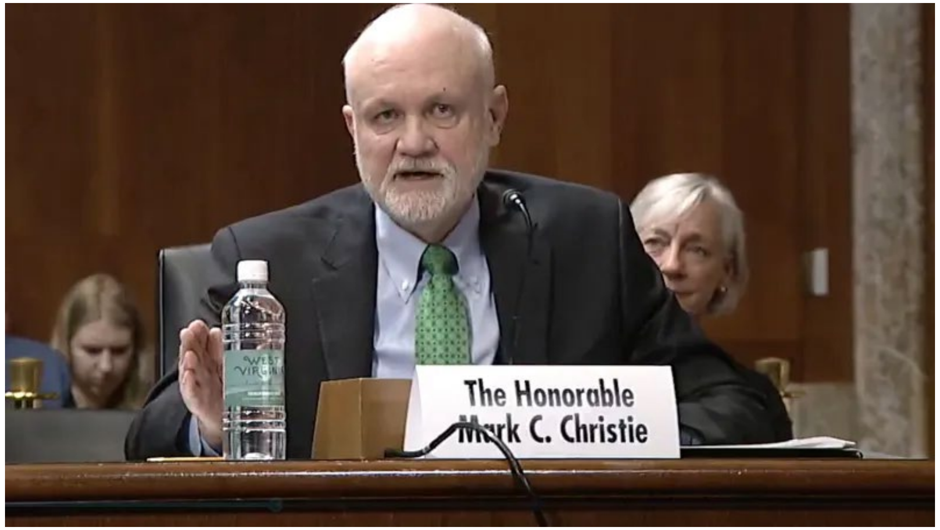
- President Trump appointed Chris Wright as Secretary of Energy.
  - Secretary Wright has expressed support for more access to oil, gas, and coal but stated during his confirmation hearing that he advocates an "all-of-the-above" approach to energy production.
- Since the start of President Trump's term, about 2000 DOE employees have been fired. These include:
  - One-fourth of the staff at the Loan Programs Office, which provides cheap funds to clean energy programs.
  - Employees at the National Nuclear Security Administration, many of whom were subsequently rehired.

Liquified Natural Gas (LNG) Terminals

- The Unleashing American Energy EO directed the Secretary of Energy to restart reviews—frozen during the Biden administration—of applications for liquified natural gas export projects.
- President Biden had paused LNG export project applications for countries—including China and certain EU members—that lacked a free trade agreement with the United States.
- The EO also directed the DOE, in conjunction with the U.S. Maritime Administration, to review applications “as expeditiously as possible.”
- On February 14, the Secretary approved an export authorization for the Commonwealth LNG project in Louisiana.
  - The administration has stated its intention to return to the approval of LNG facilities in the regular order.
  - The DOE will eventually need to address the DOE’s LNG study released in December 2024 at the end of the Biden administration.

Federal Energy Regulatory Commission

- President Trump appointed Mark Christie, already on the Commission, as chair of FERC.
- No reports of employee terminations.
- FERC is funded by regulated entities and is budget-neutral, differing from other executive agencies.
- Christie has stressed that his priorities in office are affordable energy for consumers and ensuring reliability of the grid.



FERC Priority: Responding to Load Growth

- FERC's priority appears to be ensuring the reliability and capacity of the grid with the increased load growth associated with data centers.
- Data centers are projected to account for between 11% and 12% of total U.S. power demand by 2030, in comparison to 3%-4% today. To meet this demand, data centers are looking to build new capacity and restore defunct power plants.
- The increase in demand could increase prices for existing users and affect the reliability of the grid.
- FERC is currently assessing how to respond to this increased load growth, but utilities, generators, and data center customers have urged the Commission to issue guidance quickly and comprehensively. FERC will hold a **technical conference** in June 2025 to explore issues of resource adequacy in RTO and ISO regions.
- On February 20, FERC launched a review of issues associated with the co-location of large loads, such as data centers, at generating facilities in PJM. FERC found PJM's tariff does not adequately address these arrangements and prevents generators and users from determining how to establish co-located arrangements. **Order Instituting Proceeding Under Section 206 of the Federal Power Act**, 190 FERC ¶ 61, 115 (Feb. 20, 2025).

Status as an Independent Agency

- Under the Accountability for All Agencies EO, FERC will need to submit proposed and final "significant regulatory actions" to the Office of Information and Regulatory Affairs.
  - Christie downplayed the impact of the executive order on independent agencies in a recent press conference but stated that he was still reviewing the language in detail.
- FERC may need to follow the ten-to-one deregulatory EO as well.
  - Although FERC was exempted from the two-for-one rule, it is unclear without OMB guidance if it will be exempted from this rule.
- The status of the FERC commissioner's "for-cause" protections are also up in the air after President Trump fired Gwynne Wilcox, chair of the NLRB.
  - By statute, a President can remove Board Members of the NLRB and FERC Commissioners only for "neglect of duty" or "malfeasance."
  - Wilcox has filed a lawsuit in the District Court for the District of Columbia challenging her firing.
  - Precedent dating to the 1930s supports the constitutionality of such protections, but recent Supreme Court decisions indicate a majority of the Court might be willing to revisit.
- The "for-cause" protections of FERC ALJs may also be in peril. On February 20, the Acting Solicitor General issued a letter stating that multiple layers of removal restrictions for ALJs violate the Constitution under the Supreme Court's precedent in *Free Enterprise Fund v. PCAOB*.

NEPA Environmental Review

- EO 14154 rescinded **Protection and Enhancement of Environmental Quality**, Exec. Order 11514 (Mar. 7, 1970), which was the authority for CEQ regulations implementing National Environmental Policy Act (NEPA) Review.
  - The EO directs federal agencies to revise their NEPA implementing procedures (or establish new procedures if they do not have any) to expedite permitting approvals.
- On February 19, the Council on Environmental Quality issued a **draft interim final rule**, which will remove these CEQ regulations 45 days after the rule is published in the *Federal Register*.
  - CEQ also issued **guidance** that instructs agencies to "voluntarily" rely on existing NEPA regulations to complete NEPA review or defend against existing challenges.
- FERC is the lead NEPA agency for natural gas pipeline and LNG facility reviews.
- FERC follows CEQ guidance but also has its own NEPA regulations that "supplement" the CEQ regulations.
- The impact of the CEQ changes on FERC is an open question.
  - In 2024, the D.C. Circuit vacated FERC's approval of two LNG export terminals and a natural gas pipeline. *City of Port Isabel v. FERC*, No. 23-1175 (D.C. Cir. 2024).
  - In the wake of EO 14154, FERC has asked the D.C. Circuit to withdraw the decision, as it relied on environmental justice considerations found in current FERC regulations.

Department of the Interior

- President Trump appointed Doug Burgum as Secretary of the Interior
- About 2,300 DOI employees have been fired since the start of the new administration.
  - 800 from the Bureau of Land Management
  - 1,000 from the National Park Service

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Oil and Gas on the Outer Continental Shelf

- Under **Executive Order 14148, Initial Recissions of Harmful Executive Orders (Jan. 20, 2025)**, President Trump withdrew three EOs issued by the Biden administration that withdrew the Outer Continental Shelf from oil and gas leasing.

- The Biden EOs prevented drilling activity on the Outer Continental Shelf in certain areas in the Pacific and Atlantic oceans, the Gulf of Mexico, and the Northern Bering Sea in Alaska.

- Several environmental groups have sued President Trump in the U.S. District Court for the District of Alaska to enjoin the order.

- In a **memorandum** dated January 20, President Trump has also banned offshore wind farms on the Outer Continental Shelf until DOI, DOE, and the EPA “assess the environmental impact and cost of defunct and idle windmills.”

Unleashing Alaska's Extraordinary Resource Potential

Exec. Order 14153

- On January 20, President Trump issued an **Executive Order** that directs agencies, including the DOI, to "take all necessary steps" to enable the State of Alaska to develop its "abundant and largely untapped supply of natural resources."

- The executive order directs agencies to rescind or revise restrictions, policies, and environmental reviews that limit resource development on federal and state lands, including the Arctic National Wildlife Refuge.

- The Secretary of the Interior issued an order to implement this EO, directing the agency to review all restrictions on resource development in Alaska and develop a plan of action to carry out the EO.

Order Implementing "Unleashing American Energy"

SO 3418 (Feb. 3, 2025)

- The Secretary of Energy issued several orders implementing President Trump's energy agenda, including **Order No. 3418** (Feb. 3, 2025).
- The SO seeks to remove "impediments imposed on the development and use of our Nation's abundant energy and natural resources by the Biden administration's burdensome regulations."
- The SO directs DOI's assistant secretaries to present an action plan to "consider how to comply" with E.O. 14154 and the steps needed to "suspend, revise, or rescind" agency guidance and orders which implemented the now-rescinded Biden-era executive orders.
    - The actions plan should include the steps needed to "prioritize reducing barriers to the use of Federal lands for energy development," "revise all undue burdens on the domestic mining and processing of nonfuel minerals," "offer more parcels of the public land for oil and gas leasing," "revise all withdrawn public lands . . . including 54 U.S.C. § 320301 and 43 U.S.C. § 1714," and "ensure that . . . policies relating to the development of energy resources on Federal land do not bias government or private-sector decision making in favor of renewable energy projects as compared to oil, gas, or other mineral resource projects," among other goals.
- Although action plans were due to the Secretary on February 18, they have not been released to the public. Senator Heinrich and Representative Huffman, both Ranking Members of their respective chamber's Energy and Natural Resources Committee, have requested their disclosure.

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Environmental Protection Agency

- President Trump made Lee Zeldin one of his first cabinet appointments.
- Focus is consistent with stated objectives in energy executive orders.
- Many hundreds of probationary EPA staffers have been fired.
- First major administrative action targeting Inflation Reduction Act greenhouse gas grant program.

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Department of Treasury

- President Trump appointed Scott Bessent Secretary of the Treasury.
- Bessent is also the acting Director of the Consumer Financial Protection Bureau.
- More than 6700 IRS employees were fired on Thursday, February 20.

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Clean Hydrogen Tax Credit

90 Fed. Reg. 2224 (Jan. 10, 2025)

- On January 10, the Department of Treasury issued a **final rule** on the Section 45V tax credit for clean hydrogen production.
- The tax credit aims to reduce the cost of green hydrogen, which is currently far higher than grey hydrogen (produced by gas-based steam methane reforming) or blue hydrogen (produced from gas and carbon capture technologies).
- Developers are currently able to take advantage of the credit, but its future status is unclear.
- President Trump recalibrated the administration away from clean hydrogen, including freezing $7 billion in DOE funds earmarked for hydrogen hubs.
- It is possible that Congress could remove the clean hydrogen production tax credit this year. A coalition of businesses and organizations representing the American hydrogen industry have appealed to Congress to maintain the country's investment in this resource.

Iranian Oil Sanctions

- On February 4, President Trump issued a **memorandum** that directed the Secretary of the Treasury to impose sanctions "on all persons for which the Department has evidence of activity in violation of one or more Iran-related sanctions."

- Pursuant to that memorandum, the Treasury's Office of Foreign Asset Controls and the State Department imposed sanctions on over 30 persons and vessels for their role in the sale and transportation of Iranian petroleum-related products**. Treasury Imposes Additional Sanctions on Iran's Shadow Fleet** (Feb. 24, 2025).

- Secretary Bessent indicated that these will not be the last sanctions targeting Iranian oil producers, stating that "[t]he United States will use all our available tools to target all aspects of Iran's oil supply chain, and anyone who deals in Iranian oil exposes themselves to significant sanctions risk."

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Department of Transportation

- President Trump appointed Sean Duffy Secretary of Transportation
- Numbers on the number of DOT employees fired are unclear, but Secretary Duffy recently stated that fewer than 400 Federal Aviation Administration employees have been laid off.

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Implementation of Energy EOs

- The Secretary issued a new order on January 29, 2025, implementing President Trump's Energy EOs and shifting away from the Biden administration's climate change policies. **DOT Order Ensuring Reliance Upon Sound Economic Analysis in Policies, Programs, and Activities** (Jan. 29, 2025).
  - DOT will no longer use the social cost of carbon estimates in its analyses. The Secretary argued that this calculation is overly speculative and burdensome on businesses.
- Under a memorandum issued the same day, state and local governments that utilize DOT funding must now align their projects with new federal priorities, shifting away from climate and equity-based initiatives toward economic and family-focused criteria. **Memorandum Implementing Executive Orders Addressing Energy, Climate Change, Diversity, and Gender** (Jan. 29, 2025)

Energy and Environmental Legislation – Laying a Legal Foundation Supporting Trump Administration Priorities

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Legislative Priorities in 2025

- **Republican-led Congress** prioritizing domestic energy production.
- **Streamlining permitting** for energy infrastructure projects.
- **Cutting clean energy incentives** in favor of oil, gas, and nuclear investments.

The Budget Reconciliation Process and Energy Policy in 2025

Key Aspects of Budget Reconciliation

- Fast-Track Legislative Tool: Allows passage with a simple majority (51 votes).
- Bypasses Filibuster: Limited to budget-related provisions.
- Current Use: 2025 reconciliation aims to reshape energy and environmental policy.

Oil and Gas Expansion Proposals

- Offshore Drilling: 2.8 million acres reopened for oil production (+15% by 2026).
- Methane Regulation Repeal: Eliminates EPA leak detection requirements.
- Royalty Reductions: Lowering onshore drilling fees to incentivize production.

Renewable Energy Constraints

- EV Tax Credit Cuts: Risks 216,000 jobs in affected districts.
- Offshore Wind Moratorium: Freezing 18 GW of planned capacity.
- NEPA Revisions: Eases approval for oil and gas projects by streamlining permitting and reducing environmental review requirements, while also expediting certain renewable energy projects.

Congressional Review Act and Evaluation of Recent Energy Regulations

- What is eligible for review?
- What is the process for rule reversal?
- What is happening right now?
  - This week, the House is planning on using the CRA to rescind two Biden administration rules: (1) an EPA rule fining oil and gas operators for exceeding methane emission limits and (2) a DOE efficiency standard for gas-fired water heaters.

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Reprioritizing Economic Development over Climate Change and Environmental Initiatives

Suspended or Reduced Funding for Climate Programs

- **Bipartisan Infrastructure Law (BIL):** Delayed funding for EV charging networks, renewable energy projects.

- **Inflation Reduction Act (IRA):** Paused clean energy tax credits and grants but retained nuclear energy investment credits.

- **Environmental and Climate Justice Programs:** Defunded or significantly reduced.

Environmental Policy Implications and Strategic Challenges – Regulatory Rollbacks

- **Endangerment Finding Reversal:** Limits EPA's ability to regulate greenhouse gases, potentially reducing federal oversight of carbon emissions and weakening climate change mitigation efforts. This change could lead to increased emissions but may also reduce regulatory costs for industries.

- **Social Cost of Carbon Elimination:** Removes climate impact metrics from policymaking.

- **Environmental Justice Cuts:** $3 billion in pollution reduction grants eliminated.

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