

Project 21 comments the Environmental Protection Agency Draft Fiscal Year 2022-2026 Strategic Plan

(Docket EPA-HQ-OA-2021-0403)

Fundamentally flawed. That's the only way to describe the Environmental Protection Agency's new strategic plan.

Administrator [Michael S. Regan](#) wants to put the EPA "at the center" of the Biden Administration's equity agenda by pushing "environmental justice" policies likely to cause more harm than good. Instead of purportedly protecting minorities from a disproportionate share of eco-hazards, environmental justice actually puts unaccountable elites and their bureaucratic minions in the position of regulating the dispossessed to the degree they become wards of the state – further disenfranchising them.

EPA proposes [adding](#) the pursuit of justice and equity as a fourth key agency principle while making environmental justice a "strategic goal." This is inherently incompatible with the agency's three founding principles: following the science, following the law and transparency. Tying things like regulation, grantmaking and permitting to the theoretical long-term "[social cost](#)" of emissions and statistical "[disparities](#)" – without authorization or input from Congress – creates a playground for a politicized civil service that's pushing a political agenda.

Upping the ante, and reason for concern, are the strong ties between the concepts of environmental justice and critical race theory. Equitable, government-mandated social outcomes with selected beneficiaries and alleged systemic perpetrators are a shared goal of these controversial schemes. But, in picking winners and losers, the green lobby has pushed the government to side the people, parties and policies that have not helped minorities in the ways they were advertised.

Consider that one of President Biden's first acts was to effectively cancel the [Keystone XL](#) pipeline along with other Trump-era energy policies claimed to "disproportionately harm communities of color." Killing the pipeline actually deprived blue-collar Americans – many of them minorities – of good-paying [jobs](#) in and around the energy industry. And the loss of the oil that a completed pipeline would transport into the United States exacerbates prospects for many of these same communities of color to escape [energy poverty](#) that forces them to spend more of their meager financial resources on the necessities of heat and light.

Then there are the "trickle down" problems to consider. Solutions to violent crime, drug abuse, high out-of-wedlock birth rates and poor public schools cannot be remedied by addressing [perceived](#) climate conditions decades in the future or installing [charging stations](#) for luxury electric vehicles in "underserved" communities. Jobs can help these households, improve their

living conditions and help families realize their full potential as they rise up the socioeconomic ladder. That should be the EPA's strategic goal.

Pembroke County, Illinois is home to a poor community of black farmers. A proposed natural gas pipeline to supply residents with power is an example of a current environmental justice concern. Critics of the pipeline want [renewable](#) energy like wind or solar – something local Mayor [Mark Hodge](#) of Hopkins Park said is too expensive. National Urban League President [Marc Morial](#) criticized outside pressure against the pipeline, noting that “people are debating these issues in some instances without consultation with the leaders of the African-American communities and neighborhoods affected by these issues.” Even [Al Sharpton](#) weighed in, adding that “people in communities of color should not pay the brunt of suffering through cold winters.”

If the EPA were to address the needs of people directly affected by environmental justice policies, the strategic plan would be much different. Focus on the impact of regulations. Respondents to an April 2021 TIPP Poll enthusiastically supported an idea recommended in Project 21's “Blueprint for a Better Deal for Black America” that new regulations undergo a “minority impact assessment” to ensure they don't overburden at-risk communities. Keep red tape from affecting job creation, wealth accumulation and other kitchen-table concerns. While 72 percent overall endorsed this check on new regulation, polling in communities considered low-income and liberal supported the safeguard by 75%.

Environmental justice as it is laid out in the Biden EPA's strategic plan weaponizes the bureaucracy. It pits communities and people against each other. It sows discontent and distrust – placing political gains over clean-up goals.