



Earthjustice Project 2025 Analysis

Project 2025 is a policy blueprint written by Republican influencers and former Trump administration officials to guide a potential second Trump administration. It spells out a deregulatory policy agenda that would weaken or eliminate many legal protections, downsize or eliminate many federal agencies, and restrict their policymaking and enforcement capacity. As part of that, Project 2025 makes extensive recommendations to effectively dismantle agencies that regulate health and environmental protections and allow industry to operate with impunity, hamstringing the federal governments' ability to protect critical biodiversity, transition to clean energy, and continue to protect communities harmed by pollution and toxic chemicals.

Earthjustice has reviewed the chapters of Project 2025 that are most relevant to our work and the broader environmental and legal space. Taken together, these chapters encompass hundreds of pages, each one of which offers numerous recommendations. This brief memo presents high-level observations and offers illustrative examples, not a comprehensive analysis.

The authors of Project 2025 question the existence of climate change and express skepticism that the federal government can or should address its ongoing impacts.

The authors of Project 2025 dismiss the “perceived threat” (p. 419) of climate change as a tool that liberals and progressives are using to distort agencies’ missions and “to scare the American public into accepting their ineffective, liberty-crushing regulations, diminished private property rights, and exorbitant costs” (*id.*).

These statements reject the overwhelming consensus, based on abundant scientific evidence, that human activity has caused global warming and climate change. Climate change is already causing significant disruptions, from extreme heat and stronger storms to increases in climate migration. The costs of inaction are in the billions and climbing.

These statements also ignore the fact that Congress has given agencies, including EPA, the authority to address climate change in several pieces of [legislation](#), including the Clean Air Act, Clean Water Act, Inflation Reduction Act, Infrastructure Investment and Jobs Act, Energy Policy Act of 2005, Energy Independence and Security Act of 2007, and Global Change Research Act of 1990. Agencies are therefore fulfilling their mission by responding to climate concerns.

Policies presented in Project 2025 would end or restrict federal investments in clean energy and prioritize the export and production of fossil fuels.



The authors of Project 2025 propose rolling back federal legislation that commits federal dollars to the fight against climate change and the transition to clean energy. It seeks to repeal the Inflation Reduction Act and the Infrastructure Investment and Jobs Act (p. 365). Project 2025 would also end a long list of programs like DOE loan guarantees for next-generation energy infrastructure (p. 384) and refocus agencies like the Office on Energy Efficiency and Renewable Energy away from working on climate change and supporting projects that reduce carbon emissions (p. 378).

Project 2025 calls for the next conservative administration to focus instead on expanding fossil fuel production and consumption. It tells the Federal Energy Regulatory Commission (FERC) that it “should not use environmental issues like climate change as a reason to stop LNG [liquid natural gas] projects” (p. 407). It pushes for approval of LNG pipelines (p. 406) and export facilities (p. 407). It would also expand oil and gas development in Alaska’s Western Arctic (p. 530) and Arctic National Wildlife Refuge (p. 523), offer oil and gas leases in Chaco Canyon, Thompson Divide, and the Boundary Waters (*id.*), and restart and expand federal coal leasing (*id.*)

Taken together, ending support for clean energy and increasing support for fossil fuels would significantly set back progress in reducing carbon emissions and accelerate climate change. An analysis from [Energy Innovation](#) found that enacting Project 2025 would increase carbon emissions by 2.7 billion tons by 2030 — equivalent to the annual emissions of India. These policies would not only put U.S. climate targets out of reach — they would cost households \$32 billion in higher energy costs, result in 1.7 million lost jobs, and decrease the U.S. GDP \$320 billion per year by 2030.

Project 2025 authors aim to eliminate dozens of government offices, projects, and programs aimed at studying and responding to the climate crisis.

Project 2025 proposes altogether eliminating many projects and government offices that focus on studying climate change and advancing the clean energy transition. These include:

- The National Oceanic and Atmospheric Administration (NOAA) (p. 664)
- Within the Department of Energy:
 - The Office of Clean Energy Demonstrations (OCED) (p. 382)
 - The Grid Deployment Office (p. 380)
 - Advanced Research Projects Agency (ARPA-E) (p. 385)



- The Office of Fossil Energy and Carbon Management (FECM) (p. 377) (alternatively, Project 2025 proposes that the office be renamed and reoriented to focus on producing fossil fuels, not on addressing carbon dioxide produced during that process)
- The Office of Energy Efficiency and Renewable Energy (EERE) (p. 379)
- Appliance Efficiency Standards (p. 378)
- The Loan Program Office (p. 384)
- Federal mandates and subsidies for electric vehicles (p. 537)
- Participation in the Paris Climate Agreement. (p. 709).

Eliminating these offices and activities would blind the nation to important information about climate change and hamstring the federal government in responding to it. While Project 2025 questions the value of these offices, the reality is that they deliver enormous benefits to the American public. For example, the ARPA-E program was created in 2007 as a “moonshot factory” to fund high-risk, high-reward clean energy projects that cannot yet attract private-sector investment. It has provided \$3.7 billion to more than 1,500 projects that are advancing technology in the power sector, agriculture, aviation, fusion energy, and more. ARPA-E investments have led to the development of highly efficient solar panels, hybrid-electric aircraft, and other technologies that reduce emissions and accelerate the clean energy transition. Meanwhile, energy efficiency standards set by the Office of Energy Efficiency and Renewable Energy (EERE) reduce energy and water usage from more than 60 products, from washing machines and dishwashers to furnaces and air conditioners. Since it launched in 1992, the [ENERGY STAR](#) program has prevented 4 billion metric tons of climate pollution and saved American families and businesses more than \$500 billion in energy costs. Eliminating common-sense energy efficiency standards would significantly increase pollution and costs for American families.

Project 2025 would weaken or repeal many federal environmental laws.

Project 2025 would amend the National Environmental Policy Act (NEPA) to bar courts from reviewing whether an agency completed proper environmental assessments and ensured public awareness of projects, rendering key portions of the law moot (p. 533). Project 2025 also recommends amending the Clean Air Act to eliminate EPA’s responsibility to set health-based air quality standards in favor of letting Congress set standards based on political considerations (p. 425). It would rewrite the Endangered Species Act in ways that would harm endangered and threatened wildlife and those who depend on the ecosystems that support them (p. 533). It also proposes an outright repeal of the Antiquities Act, ending the president’s ability to protect priceless public lands and waters as national



monuments (p. 532). (As discussed elsewhere, Project 2025 also calls for repeal or substantial amendment of the IJA (p. 365), the IRA (p. 365), and the Energy Policy and Conservation Act (p. 378).)

Laws like NEPA, the Clean Air Act, and the Endangered Species Act were passed by bipartisan Congresses a half century or more ago. These laws have been so successful that many other countries have used them as models for their own environmental legislation. And they continue to provide strong protections despite many industry-sponsored lobbying efforts to weaken them.

Thanks to the Clean Air Act, the country just strengthened national air rules for particulate matter, or soot, once again. This cuts pollution and prevents thousands of premature deaths and new asthma cases — all while saving billions of dollars in health net benefits. Adoption of Mercury and Air Toxics Standards (MATS), too, has been a game changer by reducing mercury and other air pollution from power plants linked to heart disease and cancer, among other illnesses, saving up to 11,000 lives each year from premature death.

The public broadly supports these environmental laws because they have generated progress. The amendments Project 2025 proposes would nevertheless weaken these laws purely for the benefit of industry.

Project 2025 authors recommend eliminating EPA’s enforcement office, reassigning environmental enforcement responsibilities at the Department of Justice (DOJ), and emphasizing industry assistance over enforcement.

Project 2025 recommends eliminating the main enforcement office at EPA — the Office of Enforcement and Compliance Assistance (OECA) (p. 421) — suggesting that its functions be scattered into other EPA offices. Project 2025 also recommends eliminating the ability of DOJ’s environmental division to enforce criminal violations of environmental laws and removing the ability of DOJ’s career civil rights lawyers to enforce criminal violations of the Civil Rights Act (p. 562 and fn. 77). It also makes more subtle changes such as revisiting the Clean Water Act’s criminal negligence standard (p. 429).

While Project 2025 touts these changes as improvements, they would stymie enforcement of environmental laws. OECA was created to centralize and drive environmental enforcement because the EPA divisions that are focused on developing policy in subject matter areas (e.g. air, water, and waste) struggled to do so, particularly in instances where polluters were violating multiple laws at the same time. Similarly, DOJ’s dedicated environmental enforcement lawyers have developed significant subject matter expertise in



enforcing technically complex environmental laws; reassigning their responsibilities to DOJ's general-purpose divisions would impede the ability to enforce environmental protections in court, which is the goal of Project 2025.

More generally, weakening environmental enforcement would have serious consequences. Project 2025 suggests that federal agencies can rely on corporations to voluntarily follow our environmental laws, but the reality is that businesses only comply when they know there are consequences for noncompliance with any rule that would impact their bottom line. Ensuring compliance takes resources, initiative, and sustained effort over time, because big polluters use armies of lawyers to evade and delay penalties.

Project 2025 plans would delegate more federal regulatory authority to states — and reduce federal supervision of state regulatory efforts.

Project 2025 directs EPA and other agencies to cede regulatory authority to states wherever possible, on the illusory theory that ceding federal authority to the states will lead to better environmental outcomes (p. 524).

As an initial matter, Project 2025's directives appear driven more by deregulatory goals and fossil fuel interests than by a belief in state-level expertise. For example, Project 2025 recommends passage of the ONSHORE Act, which would give fossil-producing states greater authority to allow drilling on federal oil and gas lands (p. 522-23). However it recommends *restricting* states' authority to regulate for environmental benefits. Likewise, it recommends eliminating state authority to veto federal water permits, almost surely because conservatives and industry dislike the ways in which "blue" states have used that authority to protect their waters (p. 429). It would similarly limit California's authority to regulate GHG emissions from vehicles and block any state that seeks to adopt them, as the Clean Air Act currently allows (p. 426).

More generally, Project 2025 ignores historical lessons about environmental protection by suggesting that states are better regulators than the federal government. Congress created EPA and passed federal laws like the Clean Air Act and Clean Water Act because prior state-based approaches had [failed](#). Cities were [choking](#) on air pollution visible from space, and rivers like the [Cuyahoga](#) in Ohio were so polluted that they were catching on fire.

One reason states failed as regulators is that they have no incentive to address effects on neighboring states of activities within their borders. Another is that states have economic incentives to weaken environmental regulations to draw industrial investment away from their neighbors. Finally, state agencies are chronically underfunded and even shrinking. In



the past decade, [most states cut environmental budgets and staff](#). Some get no state-level funding [at all](#) and are financed exclusively through EPA grants and fees they collect from industrial facilities. Most are ill-equipped to push back against industry political and legal pressure — or, worse, are already so captured by industry interests that they have facilitated the creation of environmental justice “sacrifice zones.” For example, the Louisiana Department of Environmental Quality (LDEQ) [still refuses](#) to acknowledge that unchecked industrial pollution is worsening health outcomes in Cancer Alley communities despite decades of data. [Something similar](#) is happening in Houston, Texas, where mostly Black and Latino communities live surrounded by some 600-plus facilities that operate along the ship channel. These communities have life expectancies up to 20 years shorter than those who live in predominantly white and affluent areas about 15 miles to the west.

By transferring federal authority back to states, Project 2025 would allow industry-friendly states to set off a race to the bottom, weakening environmental protections around the country.

Project 2025 authors would change EPA’s approach to regulating cancer-causing toxic substances by demanding greater certainty in regulatory actions, making counter-factual assumptions, and creating regulatory loopholes.

Project 2025 would change EPA’s approach to regulating toxics and its authority to do so, particularly under the Toxic Substances Control Act (TSCA), which Congress revitalized through substantial amendments in 2016. The recommended changes would lead EPA to regulate less frequently and less aggressively, allowing chemical and petrochemical companies to produce more amounts and more types of potentially harmful chemicals.

For example, Project 2025 calls on EPA to use TSCA and other regulatory authority only where there is scientific certainty about every aspect of a particular harm and the benefits of any proposed solutions (p. 422, 433). Demanding greater certainty around toxics inevitably fails to protect communities, workers, and the environment. That is because most chemicals in commerce have not been studied, and to the extent that they have, the chemical industry’s “confidentiality” claims have left us with very little data about most of the tens of thousands of chemicals that are already in our food, water, homes, schools, and bodies. EPA attempts to protect the public from hazardous chemicals by seeking to [not underestimate risk](#), via so-called uncertainty factors. This is a standard scientific approach to evaluate chemical harm endorsed by the [National Academies of Sciences](#) and others, designed to avoid understating health risks, that Project 2025 would put an end to. If EPA — which already doesn’t follow the [precautionary approach](#) it aspires to — waited for



scientific certainty to regulate chemicals, even when there is good reason to conclude that they are harmful, people would die or suffer serious health harms due to EPA's delay in acting. But that is what Project 2025 calls for by instructing EPA to “[r]eject precautionary default models and uncertainty factors” (p. 438).

Instructing EPA to pay attention to “uncertainties” in balancing costs and benefits (p. 423) similarly favors deregulation because it is much easier to estimate compliance costs than health and environmental benefits. In fact, [studies](#) have shown that [industry and EPA tend to overestimate costs](#) while [EPA consistently underestimates benefits](#). Additionally, every significant rule promulgated by federal agencies includes economic analyses (such as cost-benefit analysis) and then undergoes *further* cost-benefit analysis at the White House Office of Management and Budget, as required by Executive Order 12866 from 1993, prior to finalization. Extensive cost-benefit analysis with underestimated benefits from environmental protection is *already* the norm. Project 2025 recommends a return to what we saw during the Trump administration. During those four years, agencies carried out massive deregulation efforts, [egregiously ignoring](#) environmental benefits and intentionally making [faulty assumptions](#) to justify political goals.

Relatedly, Project 2025 instructs EPA to make assumptions that will lead the agency to regulate less protectively. For example, it requires the agency to assume in its risk analysis that companies are ensuring full compliance with OSHA requirements regarding personal protective equipment (p. 434). Assumptions like these deny reality; [workers often do not wear PPE](#). Moreover, OSHA itself admits [that its standards are out of date](#) and may leave workers exposed to chemicals at hazardous levels. So, even if employers were in compliance, OSHA safeguards wouldn't adequately protect workers. In addition, Project 2025 tells the EPA to decline to regulate certain toxic exposures under TSCA, the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and the Federal Food, Drug, and Cosmetic Act (FDCA) if they could *potentially* be regulated under another statute or program office (p. 433). This assumes that toxic chemicals are regulated by other EPA programs or statutes and undermines Congress's intent to regulate chemicals holistically under TSCA.

Finally, Project 2025 proposes numerous loopholes and offramps to pollution and toxics laws, hampering EPA's ability to meaningfully regulate manufactured chemicals under TSCA, polluting facilities under the Clean Air Act, and PFAS — a.k.a. forever chemicals — under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). For example, it specifically calls for EPA to undo its determination under CERCLA that PFAS are hazardous substances (p. 431). It would also redefine toxic wastes



as “recycled materials,” a semantic twist that the chemicals industry has long sought and that would allow it to escape RCRA regulation entirely (p. 432).

Project 2025 seeks to increase political control over science-based decision making at EPA.

Project 2025 includes recommendations aimed at increasing the influence of industry scientists and political appointees over agency scientific programs and judgments and reducing the federal government’s investments in science. While it addresses other agencies (e.g. DOE at p.371), it focuses particular attention on EPA, an agency that is required by law to make innumerable science-based regulatory decisions.

Project 2025 starts by broadly attacking EPA’s scientific work as “precautionary, bloated, unaccountable, closed, outcome-driven, hostile to public and legislative input, and inclined to pursue political rather than purely scientific goals” (p.436). To solve these alleged problems, it proposes a political oversight regime in which the EPA administrator would “[a]ppoint and empower a Science Adviser reporting directly to the Administrator in addition to a substantial investment (no fewer than six senior political appointees) charged with overseeing and reforming EPA research and science activities” (p. 436). It would similarly place political appointees in charge of EPA offices that must make scientific judgments about regulations — for instance, EPA’s Office of Transportation and Air Quality and its Office of Air Quality Planning and Standards (p. 428). Project 2025 states that in selecting political staff to oversee science reforms, the administration should prioritize “management, oversight, and execution skills...as opposed to personal scientific output” (p. 436).

Project 2025 would reduce EPA’s investments in health and exposure science. It acknowledges that EPA conducts a “wide-ranging series of science and peer review activities, some in support of regulatory programs established by our environmental laws,” but wrongly declares that EPA lacks authority to implement many of these programs (p. 437). It therefore states that an incoming administration should, on day one, declare that “EPA will not conduct any ongoing or planned science activity for which there is not clear and current congressional authorization” (p. 436). At a more granular level, it instructs the agency to “[p]ause for review all contracts above \$100,000,” specifically targeting funding for “external peer reviews and regulatory models” (p. 436). It also advocates providing financial incentives for the public to “identify scientific flaws and research misconduct” by government-funded researchers (p.438).



While restricting legitimate scientific input, Project 2025 expands industry input into EPA’s decision making. For example, it instructs an incoming administration to change the composition of the agency’s scientific advisory boards to “expand opportunities for a diversity of scientific viewpoints free of potential conflicts of interest” (p.422). For context, Project 2025’s authors believe that government funding creates conflicts of interest, but corporate funding does not.

Project 2025 makes all these changes for a simple reason: Independent health and environmental science research typically favors more stringent regulation. [Along with the National Institutes of Health, EPA](#) is an important non-industry source of data and funding for such research, so reducing EPA’s scientific budget and discounting input from EPA-funded researchers forces the agency to rely to a greater extent on industry data and science. Expanding avenues for industry input would only further expand corporate influence. [Companies have economic incentives to underestimate and even conceal the health and environmental impacts of their products.](#) History provides innumerable examples where they have done so — sometimes with disastrous consequences. By de-emphasizing, defunding, and politicizing EPA’s scientific work, Project 2025 aims to increase industry profits at the expense of public health.

Project 2025’s policy agenda would redefine the goals of environmental justice programs and eliminate DOJ and EPA offices dedicated to environmental justice.

Project 2025 questions the necessity and legality of government programs aimed at addressing racial and socioeconomic disparities in environmental outcomes. For example, the chapter devoted to the Department of Energy states:

Programs that sound innocuous, such as “energy justice,” Justice40, and DEI can be transformed to promote politicized agendas. DOE should focus on providing all Americans with access to abundant, affordable, reliable, and secure energy, and DOE should manage its employees so that everyone is treated fairly based on his or her talent, skills, and hard work. (p. 441).

The chapter devoted to EPA similarly questions and/or terminates programs aimed at addressing racial inequities. In particular, it instructs EPA to reconsider its application of Title VI of the Civil Rights Act to address environmental injustice (p. 421), and disbands EPA’s newly created Environmental Justice and External Civil Rights (p. 442).

These policy prescriptions should come as no surprise. Project 2025’s 30 chapters consistently seek to end programs designed to address racial inequalities in American life



(see, e.g. p.561). Project 2025 justifies this agenda by claiming that the Constitution affirmatively prohibits consideration of race in government decision making (e.g. at p.441, p.562). In fact, the Supreme Court has historically allowed the federal government to make race-based policy distinctions where necessary to address past harms. It has only very recently begun interpreting the Constitution to *prohibit* policies like race-based affirmative action, and in doing so has attracted criticism for discounting the persistent impacts of systemic racism in American society.

Project 2025 deserves the same criticism. Study after study demonstrate that historic racist practices like [redlining](#) continue to result in disparate health outcomes for people of color. Indeed, [ZIP code remains the strongest predictor of life expectancy](#), as race remains the strongest predictor of hazardous waste siting across the United States. Eighty percent of the nation’s incinerators are [in low-income communities and/or communities of color](#), and Black and Latino people make up [nearly two-thirds of those living within three miles of the dirtiest refineries](#). The proliferation of [toxic facilities, mines, and fossil-fuel infrastructure](#) has taken an irreparable toll on Indigenous land and cultural resources, [affecting the health and well-being of Indigenous and Tribal communities](#). By all accounts, 60 years after the passage of Title VI, [environmental injustices widely persist](#). Project 2025 does not mention these inequities, let alone try to address them.

Project 2025 authors instruct federal agencies to maximize and expedite corporate access to oil, gas, and minerals on public lands, including the Arctic National Wildlife Refuge.

Project 2025 states that “no other initiative is as important” as maximizing the extraction of fossil fuel resources from federal lands and waters (p. 520). It would greatly accelerate oil, gas, and coal leasing and production on federal lands and waters by:

- Reinstating the Trump-era “Energy Dominance Agenda,” which featured a vast increase in fossil fuel leasing on federal lands and waters (including Arctic Refuge), acceleration of federal fossil fuel permitting, approval of more pipelines like Keystone XL and Dakota Access, and withdrawal from the Paris Climate Agreement. (See pp. 522 and 524 for a list of Trump programs it would re-instate.)
- Advocating for the passage of the Lease Now Act and ONSHORE ACT, which would require federal agencies to accelerate fossil fuel lease sales and delegate to the states authority to permit oil and gas development on federal lands within their borders (p. 522).
- Issuing offshore oil and gas leases “to the maximum extent permitted” (p. 523).



- Asking Congress to rewrite the Outer Continental Shelf Lands Act (OSCLA) so that there are no longer 5-year management plans that can constrain lease sales (p. 523).
- Restarting and expanding federal coal leasing (p. 523).
- Offering lease sales for lands in Chaco Canyon, Thompson Divide, and the Boundary Waters and expanding oil and gas development in Alaska’s Western Arctic, including by increasing the size of the Willow oil and gas project (pp. 523, 530).

Project 2025 advances a false narrative that U.S. policy currently suppresses fossil fuel production. In fact, the opposite is true. Thanks to massive federal subsidies and giveaways, the United States is already the world’s leading producer of [crude oil](#) and the largest exporter of [liquefied natural gas](#) (LNG). In the western U.S., [90%](#) of the public lands managed by the Bureau of Land Management are open to oil and gas drilling. For decades, oil and gas companies have stockpiled leases on tens of millions of acres of federal land at extremely low prices, while taxpayers have been left footing the bill to clean up their environmental damage. This year, the Biden administration raised royalty rates on oil and gas extraction for the first time in 100 years — but the federal rate is still significantly lower than what states like Texas charge for drilling on state land. Implementing Project 2025 would further entrench fossil fuel production in our economic and energy landscape. This would make it difficult, if not impossible, for the United States to reach its climate goals, let alone maintain credibility as an international leader on climate issues.

Project 2025’s public lands agenda would also cause irreparable damage to priceless ecosystems and cultural resources. The reason that the agenda calls out specific areas like Chaco Canyon and the Arctic National Wildlife Refuge for development is that the federal government has consistently protected these particular landscapes because they harbor far more than just their mineral resources. The 19 million acres of tundra, rivers, and mountains of the Arctic Refuge shelter migratory birds from all 50 states and six continents each summer. It is also sacred ground to the Gwich’ in people of northeast Alaska. Project 2025 never mentions these values, let alone the damage that fossil fuel development would cause.

Project 2025 authors aim to restructure and downsize federal environmental agencies to reduce their capacity and increase political control over them.

Chapter 3 of Project 2025 proposes far-reaching changes to the structure of the federal workforce, all aimed at making it easier to remove staff and reorganize federal agencies.



Other chapters make similarly sweeping proposals for environmental agencies. For example, Chapter 13 states that “[t]o implement policies that are consistent with a conservative EPA, the agency will have to undergo a major reorganization” (p. 421). This includes relocating regional offices, terminating the newest hires in “low-value programs,” reviewing telework policies, and “rotating” senior leadership to other offices (pp. 421, 422, 443). Chapter 16 makes similar recommendations for the Bureau of Land Management (BLM) and the Office of Surface mining (p.524, p. 535).

Project 2025 cloaks these directives in the language of efficiency and local responsiveness, but the reality is that they would disrupt work, encourage staff departures, and undermine the morale and political neutrality of career staff. Its authors know this. The person who wrote the Project 2025 chapter on the Interior Department, William Perry Pendley, was the official who ordered BLM headquarters to move from Washington, D.C. to Grand Junction, Colorado during the Trump administration. Perry claimed that he made this move to bring staff closer to local stakeholders. But 97% of BLM staff already worked outside of Washington, D.C.; the administration’s real goal was to force experienced career employees, especially leading civil servants, to quit. It worked. Nearly 90% of the 600 headquarters staff were forced to leave their jobs, taking with them decades of intuitional knowledge and expertise. Their departure freed the Trump administration to hire new staff who were more aligned with their political agenda.

Project 2025 seeks to shift work on the electrical grid and power transmission sector to emphasize support for fossil fuel generation and end programs designed to improve the grid to allow for expanded renewable energy generation.

Project 2025 argues that transitioning from fossil to clean electricity generation is putting the country at risk of being unable to generate electricity when needed (p. 363). It asserts that coal and gas power are more resilient and reliable than clean energy, and it calls on FERC to revise the energy markets to focus on supporting these resources (p. 401-402, 404-405).

Project 2025 also recommends shutting down programs aimed at building new transmission capacity to allow clean energy resources to connect to the grid (p. 380). In particular, Project 2025 seeks to redirect IJIA and IRA funding for transmission to other programs and to shutter the Grid Deployment Office (GDO), which is tasked with developing the nation’s first National Transmission Plan and poised to deliver [billions in funding](#) for specific grid resilience and innovation projects (p. 368-369, 380). It would also eliminate grant programs to promote energy storage, such as batteries, and the testing of



grid-enhancing technologies, which improve the reliability, efficiency, or safety of existing power lines (p. 374). Relatedly, Project 2025 directs FERC to roll back its final rule reforming transmission planning and cost allocation and stop designating National Interest Transmission Corridors (p. 405-406).

Implementing Project 2025's transmission recommendations would all but block expansion of clean electricity generation. As explained in this [Earthjustice white paper](#), the current annual growth rate of transmission infrastructure is just one percent. The result is a backlog of roughly 8,000 generators waiting to connect to the grid, and significant uncertainty for clean energy developers about whether and when their projects will be able to provide power to homes and businesses. The current transmission bottleneck leaves huge climate benefits on the table, including those made possible through the IRA. To fully realize the IRA's emissions reductions benefits and transition to a clean grid, we need to at least double current transmission capacity by the end of this pivotal decade. Project 2025 would make that all but impossible.