

PROTECT CHILDREN’S HEALTH AND PUBLIC SAFETY – *NO CUTS TO EPA*

March 10, 2025

The Honorable Lee Zeldin,
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue
Washington, D.C. 20460

Dear Administrator Zeldin:

On Friday, February 14, 2025, your agency fired almost 400 EPA employees, after previously placing approximately 170 employees on administrative leave.¹ A decision to implement a broad workforce firing immediately undermines EPA’s ability to carry out its mission to protect public safety and fulfill core legal obligations.² The undersigned organizations are writing to express serious concern about attacks on EPA’s workforce and resources that would be an ambush on public safety and would be particularly dangerous for children’s health.

It is unclear what basis EPA could have for the claim in its emails to the fired employees that every one of them “failed to demonstrate fully [their] qualifications for continued employment.”³ Instead, it appears that the February 14 firings are part of a sweeping effort led by the DOGE arbitrarily seeking to cut the federal workforce, as discussed in Executive Order 14210. Such actions threaten public safety. Firing staff who work on reducing exposures to toxic pollutants and chemicals would be harmful to all Americans. This would constitute a direct attack on children’s health – as children are the most vulnerable to these chemical exposures. If you intend to follow the law and fulfill your promise to protect clean air, land, and water,⁴ you must not direct or allow any such arbitrary firings. Instead, you must ensure that EPA has the staffing and resources it needs to meet all of its legal duties on time and to achieve the health and environmental goals set by Congress.

You are on notice that EPA has many outstanding statutory and court-ordered obligations. EPA has no discretion to neglect its mandatory duties and responsibilities under the Clean Air Act, Toxic Substances Control Act (TSCA), Clean Water Act, Food Quality Protection Act, Federal Insecticide, Fungicide, and Rodenticide Act, and other bedrock federal environmental, health, and safety laws.⁵ Significant examples of such duties include required rulemakings and standard-setting for toxic and other harmful air pollutants known to cause cancer, reproductive harm, birth defects, lead poisoning, heart attacks, asthma, and other chronic and acute illnesses. EPA’s Office of Air and Radiation recently committed to EPA’s Office of Inspector General that it would develop and implement a strategy to timely meet binding legal

¹ [EPA fires ‘probationary’ employees - E&E News by POLITICO](#)

² [Our Mission and What We Do | US EPA](#)

³ *Id.*

⁴ [EPA Administrator Lee Zeldin Announces EPA’s “Powering the Great American Comeback” Initiative | US EPA](#)

⁵ See, e.g., 42 U.S.C. §§ 7409(d), 7410, 7411(b), 7412(d), (f).

deadlines for overdue air toxics rules, especially needed to protect children's health.⁶ EPA must follow through.

As another example, TSCA requires EPA's Office of Chemical Safety and Pollution Prevention to adopt rules to eliminate unreasonable risk from nine chemicals for which the agency has already found a serious risk of cancer, birth defects and other harms.⁷ EPA must perform scientific research and review, enforce, and provide essential technical assistance to implement important health protections for children and families. The American people need EPA to do its job to address and reduce exposure to lead and PFAS in drinking water, pesticides and other toxic chemicals, to ensure toxic waste and brownfield site cleanups move forward promptly, and to protect communities and workers in harm's way from industrial chemical disasters and other environmental and health emergencies.

Even before the firings on February 14, the agency had represented that it lacks the resources it needs to meet its statutory obligations – *i.e.*, that it needs more resources to do its job, not fewer.⁸ EPA has a responsibility to ensure it hires and retains the staff and the resources necessary to meet these obligations. Eliminating staff whose work is vital to fulfill public health duties – across program, headquarters, and regional offices – would delay and undermine health protection, flout the law, and show that EPA is seeking to avoid its duties rather than working diligently to satisfy them. Staff working across all EPA offices are essential to meet EPA's obligations – including your legal duties as Administrator. Employing a sufficient workforce of career staff is vital to advance EPA's core mission to protect public health and the environment.⁹

EPA must promptly confirm that it has not fired and will not fire any employees needed to protect health and safety – including those working on the issuance, oversight, implementation, or enforcement of any air, water, waste, chemical safety, or other health and safety standards, and those required to meet statutory or court-ordered deadlines or otherwise satisfy federal law and advance the goal of children's health and other statutory purposes. EPA must demonstrate that it is not using any personnel actions as a way to try to avoid fulfilling its legal obligations to protect health and the environment. Please respond to Patrice Simms, Vice President of Litigation for Healthy Communities, Earthjustice by return email or mail¹⁰ by March 17, 2025 to confirm that: EPA has not implemented and will not implement in the future any actions to reduce, remove, or weaken the workforce of EPA employees performing or supporting the performance of any mandatory duties under federal law or advancing protections for public health and safety, including for children's health.

⁶ [EPA Response to Final Report: “The EPA Needs to Develop a Strategy to Complete Overdue Residual Risk and Technology Reviews and to Meet the Statutory Deadlines for Upcoming Reviews” – Report No. 22-E-0026, March 30, 2022](#)

⁷ 15 U.S.C. § 2605(c)(1); EPA, Ongoing and Completed Risk Evaluations under TSCA (table), <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/ongoing-and-completed-chemical-risk-evaluations-under>. See also U.S. Gov't Accountability Office, EPA Chemical Reviews: Workforce Planning Gaps Contributed to Missed Deadlines (2023), available at <https://www.gao.gov/products/gao-23-105728>.

⁸ [EPA 2024 Budget In Brief](#) at 19, 21, 81 (Mar. 2024) (more full time staff needed to rebuild “core capacity”).

⁹ [EPA Organization Chart | US EPA](#)

¹⁰ Mailing address: 1001 G St., NW, Suite 1000, Washington, DC 20001.

Sincerely,

Earthjustice
350 Bay Area Action
350 Hawaii
7 Directions of Service
AFGE
AFGE Council 238
AFGE Local 704
Air Alliance Houston
Alaska Community Action on Toxics
Alliance for the Great Lakes
Alternatives for Community and Environment, Inc.
Animals Are Sentient Beings, Inc.
Arise for Social Justice
Bend the Curve
Beyond Pesticides
Beyond Plastics
Black Women for Wellness Action Project
Bluewater Valley Downstream Alliance
Breast Cancer Prevention Partners
Breathe Project
Buka Environmental
California Communities Against Toxics
Camden for Clean Air
Center for Environmental Health
Center for Progressive Reform
Citizens Campaign for the Environment
Clean Air Action Network of Glens Falls
Clean Air Council
Clean Cape Fear
Clean Water Action
Clean+Healthy
Climate Action Campaign
Climate Conversation Brazoria County
Climate Hawks Vote
Climate Justice Alliance
Coalition on the Environment and Jewish Life
Coming Clean Network

Community for a Cause
Concerned Citizens for Nuclear Safety
Defend Our Health
Del Amo Action Committee
Don't Waste Arizona
Earth Ethics, Inc.
EARTHDAY.ORG
Ecology Center
EcoMadres
Elders Climate Action
Endangered Species Coalition
Environmental Defense Fund
Environmental Integrity Project
Farmworker Association of Florida
Flatley Read, Inc
Food & Water Watch
Friends of the Earth
GAIA (Global Alliance for Incinerator Alternatives)
Global Center for Climate Justice
Green Science Policy Institute
Greenaction for Health and Environmental Justice
Greenpeace USA
GreenRoots
Healthy Babies Bright Futures
Healthy Ocean Coalition
Healthy@Home CHQ
Hudson Riverkeeper
Huntington Breast Cancer Action Coalition, Inc.
Illinois Environmental Council
Inland Ocean Coalition
Kentucky Waterways Alliance
Latino Outdoors
LatinoJustice PRLDEF
League of Conservation Voters
Learning Disabilities Association of NYS
Los Angeles Environmental Justice Network
Maine Unitarian Universalist State Advocacy Network
Massachusetts Public Health Alliance
Matanzas Riverkeeper

Merrimack Citizens for Clean Water
Miller-Travis & Associates
MN350
Moms Clean Air Force
Moms for a Nontoxic New York
Multicultural Alliance for a Safe Environment
NAACP Center for Environmental and Climate Justice
National Environmental Health Association
Nature for All
New Mexico Environmental Law Center
New York Sustainable Business Council
No Safe Level & Cameron Committee for a Safe Environment
Ocean Conservation Research
Oceana
Ohio River Foundation
One Mississippi
P-SNAP (Physician and Scientist Network Addressing Plastics and Health)
Partnership for the Public Good
People Over Petro Coalition
Pesticide Action and Agroecology Network
PfoaProject NY
Physicians for Social Responsibility Pennsylvania
Plastic Pollution Coalition
Rachel Carson Council
Respiratory Health Association
RiSE for Environmental Justice
Rise St. James
Riverkeeper
Safer States
SEE (Social Eco Education)
Sierra Club
Sierra Club Utah Chapter
Sound Resource Management Groups
Surfrider Foundation
Texas Environmental Justice Advocacy Services
The Enviro Show
The Last Plastic Straw
The Public Interest Law Center
Toxic Free NC

Turtle Island Restoration Network
Ubuntu Power Project, LLC
UC Irvine School of Law Center for Land, Environment & Natural Resources
Union of Concerned Scientists
Unitarian Universalists for a Just Economic Opportunity
Unleaded Kids
Utah Physicians for a Healthy Environment
Waterkeeper Alliance
WE ACT for Environmental Justice
West End Revitalization Association
Zero Waste Ithaca