



September 16, 2025

Lee Zeldin, Administrator
U.S. Environmental Protection Agency
William J. Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OAR-2025-0194: Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards

Administrator Zeldin:

The undersigned national, state and local health organizations strongly oppose the proposed repeal of the Endangerment Finding and greenhouse gas vehicles standards. The health professionals, patients and communities we represent understand the impacts of

climate change not just because of the decades of peer-reviewed research, but because they've seen firsthand how climate-fueled disasters like wildfires, flooding and extreme weather harm patients and communities.

Greenhouse gas emissions are accelerating climate change, making disasters more frequent and intense. Reducing greenhouse gas emissions is a public health imperative. EPA's ability and responsibility to do so is supported by science and the law. The transportation sector is the largest contributor in the U.S. to greenhouse gas emissions, and vehicle standards have been a tool used by EPA for decades under multiple administrators. Repealing the Endangerment Finding and greenhouse gas emissions standards for vehicles would be a massive setback for health and a direct contradiction to EPA's mission of protecting human health and the environment.

Standards to reduce greenhouse gas emissions from vehicles, and from other sources, have already helped to drive down the emissions that cause climate change. Climate change is harming Americans' health across every region of the country. Worsened air quality from wildfire smoke, more days of high ozone pollution, stronger extreme weather events and increased spread of diseases are already putting health and lives at risk.

The Fifth National Climate Assessment (NCA5), released in 2023, reaffirmed the science that the global warming experienced over the industrial era is unequivocally caused by greenhouse gas emissions from human activities. The National Climate Assessments have been produced for 20 years under both Republican and Democratic administrations, and mostly recently were a joint project of 15 federal agencies. NCA5 was a collaboration between 500 authors and 250 technical contributors representing every U.S. state and multiple territories. The report found that every region of the United States is experiencing harms of climate change, and that the impacts are projected to worsen. This is borne out by the realities seen in communities across the nation. The National Oceanic and Atmospheric Administration has reported over 400 extreme weather and climate-driven events since 1980 have caused over \$2.9 trillion in damages in the United States including floods, storms, fires and other emergencies – all of which have been increasing in frequency and severity.

To address these realities, several generations of greenhouse gas emissions standards have been implemented and designed to ensure that new vehicles are certified to cleaner performance based on manufacturers' preferred, feasible technology pathways. The proposed repeal makes no effort to analyze the impact of losing that monumental pollution reduction, or the technology advancements behind them. The transportation sector is also

a large contributor of other air pollutants that directly impact public health. Burning gasoline or diesel produces not only greenhouse gases but also other harmful air pollutants like fine particle pollution and oxides of nitrogen. Strong limits for greenhouse gases also limit these other emissions. Standards for light-, medium- and heavy-duty vehicles are already being met by manufacturers and are projected to provide billions of dollars in annual health benefits through reduced particle and ozone pollution impacts.

People's health across the United States will suffer if life-saving pollution controls are left on the manufacturing floor and the overwhelming scientific consensus – and the law – on climate change is ignored. Children will have more asthma attacks. Grandparents will die early due to unhealthy air. On behalf of the patients, communities and sectors we serve, we urge you to withdraw these dangerous repeals.

Sincerely,

Allergy & Asthma Network

Alliance of Maine Health Professionals for Climate Action

Alliance of Nurses for Healthy Environments

American Academy of Pediatrics

American Academy of Pediatrics, DC Chapter

American Academy of Pediatrics, Virginia Chapter

American Lung Association

American Public Health Association

Arizona Health Professionals for Climate Action

Arizona Public Health Association

Association of Medical School Pediatric Department Chairs

Asthma and Allergy Foundation of America

Breathe California

Breathe California Sacramento Region

Breathe Southern California

Children's Advocacy Alliance

Children's Environmental Health Network

Climate Code Blue

Climate Equity Policy Center

Climate for Health

Climate Psychiatry Alliance

Clinicians for Climate Action NJ

Concerned Health Professionals of New York

Connecticut Health Professionals for Climate Action
CPHA
Delaware Academy of Medicine and Public Health
Georgia Public Health Association
Hawaii Public Health Association
Health in Partnership
Health Resources in Action
Healthy Climate New Mexico
Healthy Climate Wisconsin
Healthy Environment Alliance of Utah (HEAL Utah)
Heluna Health
Idaho Chapter of the American Academy of Pediatrics
Illinois Chapter, American Academy of Pediatrics
Illinois Public Health Association
Infectious Diseases Society of America
Kansas Public Health Association
Lung Cancer Research Foundation
Maine Public Health Association
March of Dimes
Massachusetts Chapter of the American Academy of Pediatrics
Medical Students for a Sustainable Future
Michigan Clinicians for Climate Action
Minnesota Public Health Association
Missouri Public Health Association
Montana Chapter of the American Academy of Pediatrics
Mothers & Others for Clean Air (Georgia)
Nebraska Chapter AAP
Nevada Clinicians for Climate Action
Nevada Public Health Association
New Jersey Society for Public Health Education
New Jersey State Society of Physician Assistants
NHAAP
North America Chapter of the International Society for Environmental Epidemiology
Ohio Chapter, American Academy of Pediatrics
Oregon Pediatric Society
Oregon Physicians for Social Responsibility
OUCH-Int'l (Oncology Advocates United for Climate and Health - International)
Pennsylvania Public Health Association

Physicians for Social Responsibility
Physicians for Social Responsibility - New York
Physicians for Social Responsibility Maine
Physicians for Social Responsibility Pennsylvania
Physicians for Social Responsibility Texas
PSR Colorado - Physicians for Social Responsibility
Public Health Institute
Regional Asthma Management & Prevention
San Francisco Bay Physicians for Social Responsibility
South Dakota Public Health Association (SDPHA)
Tennessee Public Health Association
Utah Public Health Association
Washington Chapter of the American Academy of Pediatrics
Washington State Public Health Association
Wisconsin Asthma Coalition
Wisconsin Environmental Health Network
Wisconsin Public Health Association