UNITED STATES
CLIMATE
ALLIANCE

The Honorable Lee M. Zeldin
Administrator, U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20004

September 18, 2025 Docket ID No. EPA-HQ-OAR-2025-0194

Dear Administrator Zeldin,

I write on behalf of the U.S. Climate Alliance, a bipartisan coalition of 24 governors who together represent approximately 60 percent of the U.S. economy and 55 percent of the U.S. population. We are deeply concerned by the U.S. Environmental Protection Agency's proposal to repeal its longstanding determination on the harms of greenhouse gas pollution (2009 Endangerment Finding) and to eliminate all protections against this pollution from vehicles,[1] the single largest source of greenhouse gas emissions in the United States.[2] This proposal abandons EPA's legal obligations under the Clean Air Act, ignores the scientific consensus on greenhouse gases and climate change, and threatens great harm to Americans. Each of the rationales offered for these actions, including numerous proposed alternatives, is fundamentally flawed. We urge EPA to withdraw this proposal and return to its mission: protecting human health and the environment based on science, facts, and the law.

The law on this matter is clear. EPA is required under the Clean Air Act to regulate air pollutants from new motor vehicles that endanger public health or welfare,[3] including greenhouse gases that cause global climate change.[4] The statute further requires the agency to consider the best available science when identifying and regulating air pollutants that endanger Americans. EPA's duty to regulate harmful greenhouse gas pollution has been affirmed by the Supreme Court and consistently upheld through numerous legal challenges.[5] Most recently, Congress codified amendments to the Clean Air Act in 2022 to expressly deem greenhouse gases such as carbon dioxide, methane, and hydrofluorocarbons as air pollutants,[6] and in 2023, the Supreme Court chose not to revisit this longstanding precedent.[7] Unfortunately, EPA's proposal appears to willfully disregard the letter of the law and the unambiguous direction provided by Congress and the courts about its statutory responsibility.

Likewise, the science on this matter is clear. EPA's determination in 2009 on the harms of greenhouse gas pollution relied upon an extensive record of peer-reviewed climate change research and its harms to America's air quality, public safety, infrastructure, energy production, agriculture, water resources, and more. The science — including the federal government's own research, published during President Trump's first administration[8] — remains indisputable that anthropogenic greenhouse gas emissions are significant contributors to global climate change, which has catastrophic impacts on Americans. This scientific consensus is even stronger today; the latest report from the UN Intergovernmental Panel on Climate Change, based on more than 14,000 scientific publications, concluded that human-caused greenhouse gas emissions have "unequivocally" caused changes to the climate that are "rapid, intensifying, and unprecedented."[9] Yet

[1] U.S. EPA. "Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards." July 29, 2025.
[2] U.S. EPA, obtained via Freedom of Information Act (FOIA) request. "Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2023." Published by the Environmental Defense Fund on May 8, 2025.
[3] See 42 U.S.C. 7521. "Emission Standards for New Motor Vehicles or New Motor Vehicle Engines."
[4] U.S. Supreme Court. *Massachusetts v. EPA.* 549 U.S. 497 (2007).
[5] Akin Gump. "EPA's Endangerment Finding in Danger?" February 19, 2025.
[6] See 42 U.S.C. 7432 (2022) and Public Law 117-169 (2022).
[7] The New York Times. "Inside Trump's Renewed Effort to Undo a Major Climate Rule." January 28, 2025.
[8] U.S. Global Change Research Program (USGCRP). "Impacts, Risks, and Adaptation in the United States." Fourth National Climate Assessment. November 23, 2018.
[9] Intergovernmental Panel on Climate Change. "Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change." Sixth Assessment Report (AR6), August 9, 2021

EPA's proposal relies instead on a recent draft U.S. Department of Energy report developed by a small, cherry-picked group of climate skeptics that fails to meet scientific standards for reliability, does not reflect public comment, and misrepresents decades of broadly accepted science.[10]

Finally, the facts on this matter are clear:

- Climate damages are worsening and being felt by Americans across the country, as global temperatures driven by greenhouse gas pollution continue to rise. The last decade was the hottest on record, while 2024 was the single hottest year. This level of warming is not just unprecedented, but also dangerous. From devastating floods to extreme heat to catastrophic wildfire, Americans are seeing the deadly impacts of climate change with their own eyes and being forced to bear the costs. Last year was the tenth consecutive year in which 10 or more billion-dollar climate-related disasters impacted the U.S.,[11] and as of May 2025, our nation's disaster spending year-over-year had nearly topped $1 trillion, or three percent of GDP.[12] Insurance premiums have doubled since 2017, drastically increasing costs for communities and consumers at a time when household budgets are already stretched too thin,[13] while climate change also drives higher food prices,[14] higher energy prices,[15] and greater health risks,[16] among many other harms.

- Transportation is America's single largest source of greenhouse gas pollution, at nearly 35 percent, and motor vehicle emissions represent the vast majority of that total (82 percent).[17] Motor vehicles are also responsible for more greenhouse gas emissions across the Alliance's states and territories than any other single source, at nearly 30 percent of our members' collective emissions.[18] These figures, based on data from EPA's own greenhouse gas inventories, underscore the critical need for action on this sector to protect Americans from the harms of greenhouse gas pollution.

- Technological solutions are abundant and cost-effective to lower greenhouse gas pollution from motor vehicles. Manufacturers in the U.S. now offer over 100 models of cleaner cars for consumers to choose from, and millions of Americans are already making the switch. Sales of new clean cars in 2024 increased by more than five times over 2020 levels,[19] while sales of used clean cars jumped by a staggering 182 percent between 2023 and 2024 at one of the nation's top used car platforms.[20] Charging infrastructure is more widely available than ever before, with the nation on track to surpass 100,000 fast charging ports by 2027.[21] Importantly, cleaner cars are also lowering costs by thousands of dollars compared to higher-polluting vehicles, due to lower fuel and maintenance costs.[22]

The Alliance's members are demonstrating through a suite of state-level policies and actions that we can successfully reduce greenhouse gas pollution from vehicles at the same time we increase consumer choice and lower costs. It is a false choice to suggest the United States must pick between these goals; our states and territories are making clear we can do both. Between 2005 and 2022, our coalition collectively reduced greenhouse gas emissions from transportation by 17 percent — far outpacing the five percent reduction achieved by the rest of the country[23] — while deploying 68 percent of the nation's publicly available chargers

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[10] Climate Working Group, U.S. Department of Energy. "A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate." July 23, 2025.
[11] World Meteorological Organization. "State of the Global Climate 2024." March 19, 2025
[12] Bloomberg Professional Services. "The Climate Economy 2025 Outlook." June 16, 2025.
[13] Bloomberg News. "US spending on climate damage nears $1 trillion per year." June 17, 2025.
[14] USGCRP. "Agriculture, Food Systems, and Rural Communities." Fifth National Climate Assessment. November 14, 2023.
[15] USGCRP. "Energy Supply, Delivery, and Demand." Fifth National Climate Assessment. November 14, 2023.
[16] USGCRP. "Human Health." Fifth National Climate Assessment. November 14, 2023.
[17] U.S. EPA, obtained via FOIA request. "Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2023." May 8, 2025.
[18] Rhodium Group. "Taking Stock 2024: US Energy and Emissions Outlook." July 23, 2024.
[19] Argonne National Laboratory. "EV Model Availability and Sales." 2025.
[20] Carvana. "EV Trends Report: EV Owners Survey." February 2025.
[21] Paren. "US EV Fast Charging — Q2 2025." July 28, 2025.
[22] University of Michigan Center for Sustainable Systems. "Electric and gasoline vehicle total cost of ownership across US cities." January 3, 2024.
[23] U.S. Climate Alliance. "No Turning Back: America's Governors Confronting the Climate Crisis & Building a Brighter Future." October 2024.

and 71 percent of registered clean cars.[24] At the same time, our members' nation-leading clean vehicle policies and programs have simultaneously helped drive innovation, support and create good-paying jobs, promote America's energy independence, lower consumers' costs, and expand consumer choice to more vehicle models than in states without such policies.[25]

Our world is warming at a dangerous rate due to greenhouse gas pollution, which will pose increasingly dire consequences if our country fails to act. The U.S. is responsible for emitting about 25 percent of all historic greenhouse gas emissions,[26] more than any other country. That includes nearly one-third of all global emissions from on-road vehicles between 1970 and 2022 — a quantity larger than the vehicle emissions from the next nine highest countries combined.[27] Yet at this critical moment for action, EPA's proposal threatens to worsen global climate change and unleash untold harms to Americans. Alarmingly, abandonment by EPA of its emissions-reduction efforts risks increasing global greenhouse gas pollution by other countries, with further direct impacts to Americans. As the world's largest economy and second-largest emitter, actions by the U.S. to ramp up or ramp down its efforts on greenhouse gas pollution can demonstrably "either dampen or accelerate" similar actions by the international community.[28] At the same time, EPA's proposal threatens to undermine American competitiveness in the global automotive market and constrain innovation. To truly protect the safety and security of our communities, it is essential for the world to know our country is continuing its work to reduce greenhouse gas pollution from vehicles.

The vehicle emission standards finalized in March 2024 that EPA now proposes to repeal were projected to improve health outcomes and deliver nearly $2.4 trillion in net benefits through 2055. These benefits include $60 billion in cost savings from reduced vehicle fuel and maintenance costs and over $13 billion in public health savings from avoided deaths, hospitalizations, and incidence of conditions like asthma. Repealing these standards would abandon many of these economic and health benefits. Additionally, this action would create new regulatory uncertainty for states where greenhouse gas emission standards support attainment with ozone and other federal air quality standards,[29] as vehicles that emit fewer greenhouse gases also emit fewer criteria air pollutants such as fine particulate matter and ozone contributors like oxides of nitrogen. EPA's own analysis shows this proposal would contribute to dirtier air and billions of dollars in public health costs due to increased particulate matter alone,[30] while further modeling by the U.S. Energy Information Administration finds the proposal will contribute to higher gas prices for consumers.[31] The total cost to Americans is even higher, by hundreds of billions of dollars, when accounting for the social cost of greenhouse gases.[32]

For the health and welfare of communities across the Alliance — as well as our neighbors in fellow states and territories throughout the country — we implore EPA to withdraw this harmful proposal and all proposed alternatives, uphold its obligations under the law, and fulfill its mission to the American people.

Sincerely,

Casey Katims
Executive Director
U.S. Climate Alliance

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[24] U.S. Department of Energy. Alternative Fuels Data Center. "Vehicle Registration Counts by State: 2023." Accessed August 14, 2025.
[25] International Council on Clean Transportation. "Electric Vehicle Market and Policy Developments in U.S. States, 2023." May 2024.
[26] Our World in Data. "Cumulative CO2 emissions." Accessed July 30, 2025.
[27] Institute for Policy Integrity. "The Scale of Contribution: Vehicles." July 2025.
[28] Hultman, Nathan and Gross, Samantha. "How the United States can return to credible climate leadership." March 1, 2021.
[29] *Union of Concerned Scientists v. National Highway Traffic Safety Administration*. Case No. 19-1230, U.S. Court of Appeals for the District of Columbia Circuit. "Brief of *Amicus Curiae* National Association of Clean Air Agencies In Support of Neither Party." Filed July 6, 2020.
[30] U.S. EPA. "Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards: Draft Regulatory Impact Analysis." July 2025.
[31] U.S. Energy Information Administration. Annual Energy Outlook 2025. "Table 3. Energy Prices: Transportation: Motor Gasoline." Accessed July 30, 2025.
[32] Institute for Policy Integrity. "The Scale of Contribution: Vehicles." July 2025.