

September 22, 2025

Administrator Lee Zeldin

U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Docket ID EPA-HQ-OAR-2025-0194

Dear Administrator Zeldin:

On behalf of The Greenlining Institute (“Greenlining”), we urge the Environmental Protection Agency (“EPA”) to **withdraw** this proposal to overturn the 2009 Endangerment Finding and for the agency to maintain the scientifically proven fact that greenhouse gases threaten public health. Weakening the Endangerment Finding would worsen pollution, climate risk, and health inequities, especially for low-income communities, communities of color, children, and older adults who are already most exposed.

Founded in 1993, Greenlining is committed to building a just economy that is inclusive, cooperative, sustainable, participatory, fair, and healthy. We work towards a future where communities of color can build wealth, live in healthy places filled with economic opportunity, and are ready to meet the challenges posed by climate change.

According to the EPA’s own research, communities of color are disproportionately more likely to live in areas with heavy pollution.¹ People of color, Black Americans in particular, are more likely to die of environmental causes,² and more than half of the people who live close to hazardous waste are people of color.³ Moreover, a study published in September 2021 by the EPA found that racial and ethnic minority communities are projected to face higher impacts of climate

¹ U.S. EPA, *Climate Change and Social Vulnerability in the United States: A Focus on Six Impact Sectors* (Sept 2021). <https://www.epa.gov/newsreleases/epa-report-shows-disproportionate-impacts-climate-change-socially-vulnerable>

² Bai, N. (2024, July 16). *More Black Americans die from effects of air pollution*. Stanford Medicine. <https://med.stanford.edu/news/all-news/2024/07/more-black-americans-die-from-effects-of-air-pollution.html>

³ Bullard, R. D. (2007). *Achieving Environmental Justice in the 21st Century* (Part 2). American Public Health Association. https://www.apha.org/getcontentasset/38c5e91e-a651-413a-b4e9-73b76e39c225/7ca0dc9d-611d-46e2-9fd3-26a4c03ddcbb/bullard_part2.pdf

change across six areas, including health risks from changes in air quality and extreme temperature, disruptions to weather-exposed workers, and flooding threats to property.⁴

We know this from the science and we know this from the lived experience of our communities. In Greenlining's home state of California, residents of inland Stockton face elevated asthma risks linked to freight activity. Research has shown that children living near major freight railyards, like those in Stockton, experience significantly higher rates of asthma-related emergency department visits compared to those that live in neighborhoods farther away.⁵ In East Los Angeles County, neighborhoods along the I-710 freight corridor are overburdened with pollution from heavy truck traffic, ports, rail yards, and industry, with areas like these ranking highly on cumulative impact screening tools for air pollution exposure, diesel particulate matter, and elevated emergency room visits for asthma.⁶

The EPA's proposal to repeal the Endangerment Finding represents a foolish attack on climate protections and the communities most vulnerable to pollution and natural disasters, as well as one of the most significant deregulatory actions in our nations' history. If finalized, this action would strip the EPA of its core authority under the 1970 Clean Air Act to regulate and reduce the impacts of dangerous climate pollution from major sources like power plants and vehicles. The Intergovernmental Panel on Climate Change has warned that, "human activities, principally through emissions of greenhouse gases, have unequivocally caused global warming," and with further warming, climate risks will be more and more difficult to manage.⁷ Continued warming will result in even more irreversible damage to ecosystems, people, and infrastructure.

Business and industry, like engine and vehicle manufacturers, are not immune to the devastating risks posed by human-caused climate change— a strong economy is undoubtedly reliant on healthy people and a healthy planet.⁸ American innovation is "unleashed" when business and industry have strong climate standards to guarantee market confidence and market transformation, while protecting our health, communities, and environment. For example, in 2022 a total of 104,558 medium- and heavy-duty trucks were produced and

⁴ U.S. Environmental Protection Agency. (2021, September). *Climate change and social vulnerability in the United States: A focus on six impact sectors* (EPA 430-R-21-003). U.S. Environmental Protection Agency.
<https://www.epa.gov/cira/social-vulnerability-report>

⁵ Spencer-Hwang, R., Pasco-Rubio, M., Soret, S., et al. (2019). Association of major California freight railyards with asthma-related pediatric emergency department hospital visits. *Preventive Medicine Reports*, 13, 325–330.
<https://doi.org/10.1016/j.pmedr.2018.12.005>

⁶ California Office of Environmental Health Hazard Assessment (OEHHA). (2021). *CalEnviroScreen 4.0 Results*.
<https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>

⁷ IPCC. (2023). Synthesis report of the IPCC Sixth Assessment Report (AR6) Summary for Policymakers. In IPCC. Intergovernmental Panel on Climate Change.
https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_SPM.pdf

⁸ Nature's Price Tag: The economic cost of nature loss. (2025). Ceres: Sustainability Is the Bottom Line.
<https://www.ceres.org/resources/reports/natures-price-tag-the-economic-cost-of-nature-loss>

delivered for sale in California, of which 7,639, a little over 7%, were zero emission vehicles (ZEVs).⁹ Many companies like Volvo, Daimler, PACCAR, Rivian, and Ford contributed to the production and sale of ZEVs. Then in 2023, sales of new zero-emission medium- and heavy-duty trucks in California doubled, surpassing Advanced Clean Trucks goals two years ahead of schedule,¹⁰ with at least 18,473 medium- and heavy-duty ZEVs sold.¹¹ This upward trend is due to the fact that both community members across California have been defending their neighborhoods from pollution, and pushing decisionmakers to regulate industry for decades, and that the California Air Resources Board has been collaborating with engine manufacturers, amongst many other industry partners, for several years to ensure regulations were feasible and flexible. This also shows: where there is market confidence through regulation, innovation flourishes. Repealing the Endangerment Finding, and thereby removing climate regulation for vehicles and other key industries, is leaving the United States in the toxic dust of the past. The EPA's purpose is to protect human health and the environment; it has been scientifically proven and upheld unanimously in court that pollution presents a threat to both. Further, hard-working people need transportation innovation and energy independence, instead—under the Trump Administration—the EPA is forcing people, particularly low-income communities and communities of color, to deal with the deadly, real-world consequences from rejecting basic climate science that is also deeply documented in community lived experience. The EPA must uphold science, and take swift, serious action to protect public health and prevent any further warming of the planet.

This is especially true regarding the transportation sector. Transportation accounts for 28% of all greenhouse gas emissions in the United States, making vehicles in the transportation sector our largest source of emissions.¹² Repealing the Endangerment Finding is limiting American innovation, it is allowing the United States government to hold its people hostage with the EPA's refusal to preserve pragmatic, common sense science and policies that reduce fatal vehicle pollution. At a time where families are already struggling with the cost of living, rolling back vehicle pollution standards will make vehicles significantly more expensive to fuel, maintain, and repair, all while being held to volatile, shifting fuel prices.¹³ This will compound all the jobs lost

⁹ Advanced Clean Trucks Compliance and Incentives Update

<https://ww2.arb.ca.gov/resources/documents/advanced-clean-trucks-compliance-and-incentives-update>

¹⁰ 1 in 6 new trucks, buses, and vans in California are zero-emission

<https://ww2.arb.ca.gov/news/1-6-new-trucks-buses-and-vans-california-are-zero-emission>

¹¹ Advanced Clean Trucks Credit Summary Through the 2023 Model Year

<https://ww2.arb.ca.gov/resources/fact-sheets/ACT-Credits-Summary%202023>

¹² Environmental Protection Agency. (2024, June 18). Fast Facts on Transportation Greenhouse Gas Emissions. United States Environmental Protection Agency.

<https://www.epa.gov/greenvehicles/fast-facts-transportation-greenhouse-gas-emissions>

¹³ Diesel Price Nudges Up 1.9¢ to \$3.758 a Gallon. Transport Topics.

<https://www.ttnews.com/articles/diesel-price-rises-0715>

due to extreme heat from further global warming.¹⁴ Eliminating the truck pollution standards will cost the heavy-duty industry a net \$2.4 billion per year due to increased fueling and maintenance costs.¹⁵ These increased freight costs will be passed on to consumers in the form of higher retail prices for goods. Without a doubt, overturning the 2009 Endangerment Finding will damage the United States economy, and harm countless people fighting everyday to feed their families.

The federal government has been regulating vehicle pollution since the 1960's. Claims that these standards will damage American industry are entirely baseless – and disputed by the industry itself. At the time they were finalized, the EPA's car pollution standards received public support from the Alliance for Automotive Innovation (AAI)¹⁶, a trade association that represents virtually every domestic manufacturer of cars and automotive components available in the United States.¹⁷ The standards are also supported by the United Auto Workers (UAW), which has more than 400,000 active members across the auto industry.¹⁸ The Heavy-duty Leadership Group, an alliance of the country's biggest names in vehicle and engine manufacturing and supply, supported the EPA's truck pollution standards, expressing the "need for regulatory certainty and clear market signals."¹⁹

In sum, this proposal is a reckless and shameful attempt to roll back time-proven protections that cut across partisan lines. At a time when communities are demanding stronger safeguards against worsening natural disasters, EPA's effort to repeal the Endangerment Finding is not only

¹⁴ U.S. EPA, Climate Change and Social Vulnerability in the United States: A Focus on Six Impact Sectors (Sept 2021).

<https://www.epa.gov/newsreleases/epa-report-shows-disproportionate-impacts-climate-change-socially-vulnerable>

¹⁵ Biden-Harris Administration Finalizes Strongest Ever Greenhouse Gas Standards for Heavy-Duty Vehicles to Protect Public Health and Address the Climate Crisis While Keeping the American Economy Moving | US EPA. (2024, March 29). US EPA.

<https://web.archive.org/web/20250117185701/https://www.epa.gov/newsreleases/biden-harris-administration-finalizes-strongest-ever-greenhouse-gas-standards-heavy>

¹⁶ Statement on EPA Greenhouse Gas Emissions and Criteria Pollutant Rules (2027-2032)

<https://www.autosinnovate.org/posts/press-release/epa-greenhouse-gas-emissions-and-criteria-pollutant-rules-statement>

¹⁷ Our Auto Industry Members | Alliance For Automotive Innovation. (n.d.). www.autosinnovate.org.

<https://www.autosinnovate.org/about/our-members> <https://www.autosinnovate.org/about/our-members>

¹⁸ Mayhugh, J. (2024, March 20). UAW Statement on the EPA's New Greenhouse Gas Emissions Rule - UAW |

<https://uaw.org/uaw-statement-on-the-epas-new-greenhouse-gas-emissions-rule/>

¹⁹ Ford, Other Industry Leaders Support Stronger National Heavy-Duty Pollution Standards | Ford Media Center. (2024). Ford.com.

<https://www.fromtheroad.ford.com/us/en/articles/2024/ford--other-industry-leaders-support-stronger-national-heavy-duty>

dangerous, but a waste of public time and resources. Instead of dismantling its own authority, the EPA should be strengthening protections to ensure healthier, more resilient communities.

For these reasons, we urge the EPA to withdraw this proposal and preserve the Endangerment Finding, which is foundational to protecting public health and addressing the climate crisis. We call on the EPA to uphold its legal and moral obligation under the Clean Air Act to protect the public from dangerous climate pollution and to strengthen, not weaken, the safeguards that ensure a healthier and more equitable future.

Thank you for considering our comments. We remain committed to collaborating with the EPA and other partners to build a more resilient and equitable future.

Sincerely,

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Monica Palmeira
Associate Director for Economic Equity