



**Environmental
Justice Health**
Alliance for Chemical
Policy Reform



Moving Forward
Network

EQUITABLE & JUST
NATIONAL CLIMATE PLATFORM

September 22, 2025

Administrator Lee Zeldin
U.S. Environmental Protection Agency
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards
U.S. Environmental Protection Agency Docket No. EPA-HQ-OAR-2025-0194

To Administrator Zeldin:

This letter provides the comments of the undersigned parties on the Environmental Protection Agency's (EPA) proposal, *Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards*, Docket number EPA-HQ-OAR-2025-0194-0093. The EPA should immediately withdraw this proposal in its entirety. The mission of the EPA is clear: "to protect human health and the environment."¹ The EPA serves several critical functions, including developing and enforcing regulations, giving grants, and studying environmental issues.² In this past year, we have seen innumerable rollbacks in hard-fought and peer-reviewed research-based life-saving regulations, as well as the termination of millions of dollars in critical grants. The proposal to reconsider the 2009 Endangerment Finding is not happening in isolation. It comes alongside a series of recent EPA actions that weaken protections against pollution from fossil fuel combustion and other sources.

¹ Environmental Protection Agency. (July 23, 2025). Our Mission and What We Do. <https://www.epa.gov/aboutepa/our-mission-and-what-we-do>

² *Id.*

Besides the proposal regarding the Endangerment Finding and GHG Vehicle Standards, the EPA has proposed other rollbacks of regulations, including a proposal released on June 11, 2025, to repeal all greenhouse gas (GHG) emission standards for fossil fuel-fired power plants.³ On March 12, 2025, the EPA announced plans to reconsider multiple National Emission Standards for Hazardous Air Pollutants (NESHAP), including the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Synthetic Organic Chemical Manufacturing Industry (SOCMI), also known as the HON rule.⁴ If enacted, this decision will allow polluting facilities covered by those NESHAPs a two-year “compliance exemption” from Section 112(i)(4) of the Clean Air Act, meaning for industry this is tantamount to a free pass to pollute.⁵ Exposure to hazardous air pollutants pose increased cancer risk, as well as reproductive, developmental, neurotoxic, respiratory and other serious health harms, and EPA’s own calculations estimate that if implemented, the HON Rule alone would have reduced air toxics-related elevated cancer risk in communities living near HON facilities by a staggering 96%.⁶

On July 17, 2025, the White House announced HON compliance exemptions for 52 facilities, predominantly located in frontline and fenceline communities.⁷ For example, this action exempts the Celanese Clear Lake plant and the INEOS Oxide Bayport Plant in Pasadena, Texas, both of which released over ten thousand pounds of cancer-causing ethylene oxide in 2023.⁸ These facilities were granted exemptions from the HON rule that required significant reductions in ethylene oxide emissions starting in 2026.⁹ The Bakelite Synthetics facility in Louisville, Kentucky, emits cancer-causing formaldehyde and other hazardous air pollutants 500 feet from people’s homes. This facility was granted an exemption from the updated provisions in the HON rule, such as stricter control of pollutants during start-up and shut-down.¹⁰ At least seven facilities that emit large quantities of the harmful chemicals covered by the HON rule are located in Calcasieu Parish, Louisiana,¹¹ where Mossville is located.

³ Environmental Protection Agency. (July 10, 2025). Greenhouse Gas Standards and Guidelines for Fossil Fuel-Fired Power Plants | US EPA. <https://www.epa.gov/stationary-sources-air-pollution/greenhouse-gas-standards-and-guidelines-fossil-fuel-fired-power>

⁴ Environmental Protection Agency. (March 12, 2025). EPA Launches Biggest Deregulatory Action in U.S. History. <https://www.epa.gov/newsreleases/epa-launches-biggest-deregulatory-action-us-history>

⁵ Environmental Justice for All. (September 9, 2025). Polluter free passes show Trump Administration’s indifference to community health. <https://ej4all.org/news-and-media/news-item/937>

⁶ EPA’s Office of Air Quality Planning and Standards Office of Air and Radiation. (March 2024). Residual Risk Assessment for the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Source Category in Support of the 2024 Risk and Technology Review Final Rule. https://www.epa.gov/system/files/documents/2024-04/socmi_rtr_risk_assessment_report_wappendices_21mar2024.pdf

⁷ Environmental Justice for All. (September 9, 2025). Polluter free passes show Trump Administration’s indifference to community health. <https://ej4all.org/news-and-media/news-item/937>

⁸ American Industrial Hygiene Association (AIHA). (June 20, 2024). CSB outlines initial findings in investigation of 2023 Ethylene Oxide release. <https://www.aiha.org/news/240620-csb-outlines-initial-findings-in-investigation-of-2023-ethylene-oxide-release#:~:text=Over%20the%20next%20couple%20of,page%20on%20the%20CSB%20website>

⁹ Shelby Jouppli. Trump pollution exemptions would shield lawbreakers, endanger millions. Texas Chemistry Council. (July 28, 2025). <https://goodmenproject.com/featured-content/trump-pollution-exemptions-would-shield-lawbreakers-endanger-millions/>

¹⁰ Connor Giffin. (August 4, 2025). Trump gives Louisville plant more time to address pollution. Homes sit 500 feet away. Louisville Courier Journal. <https://www.courier-journal.com/story/news/local/2025/08/04/trump-grants-louisville-chemical-plant-bakelite-pollution-exemption/85405048007/?gnt-cfr=1&gca-cat=p&gca-uir=true&gca-epi=z119245p002050c002050e007600v119245b0089xxd118965&gca-ft=133&gca-ds=sophi>

¹¹ U.S. Environmental Protection Agency. List of Facilities Subject to the HON and Group I and Group II Polymers and Resins NESHAP. <https://www.epa.gov/system/files/documents/2023-04/List%20of%20Facilities%20Subject%20to%20the%20HON%20and%20Group%20I%20and%20Group%20II%20Polymers%20and%20Resins%20NESHAP.pdf>

Mossville is a historic Black community in Louisiana founded by free Black people before the end of slavery in the United States. Presently, Mossville is being affected by more than a dozen heavily polluting industrial facilities. Mossville has been found to suffer from three times the average blood-level for dioxin than that of the general population.¹² Because of the decision by the EPA, this community will no longer benefit from the new emissions limits for dioxin set by rule, which are emitted from multiple nearby HON facilities.

On June 11, 2025, the EPA proposed repealing the 2024 standards regulating hazardous air pollutants (HAPs) from coal- and oil-fired electric generating units (EGUs).¹³ These protections include the Mercury and Air Toxics Standards (MATS), which limit mercury and other toxic emissions from power plants. Mercury is a potent neurotoxin that accumulates in water and soil, moving up the food chain and concentrating especially in fish, where it poses serious risks to human health. In April 2025, the Trump administration exempted 47 companies operating 68 coal-fired EGUs from the 2024 MATS rule.¹⁴ Just three months later, in July 2025, an additional six EGUs at three facilities were exempted. The EPA has issued a direct final rule and companion proposal extending compliance deadlines for existing coal ash regulations.¹⁵ The EPA has also announced plans to “reconsider” the *Safer Communities by Chemical Accident Prevention* rule (RMP Rule) finalized in 2024, which for the first time required RMP facilities to consider the impacts of climate change in their planning. This is critical, given that about one-third of RMP facilities are located in areas that are vulnerable to increasingly extreme weather due to climate change.¹⁶ Labor and community advocates¹⁷, the Government Accountability Office¹⁸, the U.S. Chemical Safety and Hazardous Investigation Board (CSB)¹⁹, and the House Select Committee on the Climate Crisis²⁰ have all acknowledged that climate change is a multiple threat when it comes to chemical disasters.

¹² Raviya Ismail. (June 21, 2012). A Community Being Poisoned from Within. <https://earthjustice.org/article/a-community-being-poisoned-from-within>; Mossville Environmental Action Now, Inc. Wilma Subra, The Subra Company Advocates for Environmental Human Rights.(July 2007). Industrial Sources of Dioxin Poisoning in Mossville, Louisiana: A Report Based on the Government’s Own Data. <https://www.loe.org/images/content/100423/mossville.pdf>

¹³ U.S Environmental Protection Agency. (June 17. 2025). National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units <https://www.federalregister.gov/documents/2025/06/17/2025-10992/national-emission-standards-for-hazardous-air-pollutants-coal--and-oil-fired-electric-utility-steam>

¹⁴ Valerie Volcovici. (April 15, 2025). Trump exempts dozens of coal plants from mercury, air toxics limits. <https://www.reuters.com/sustainability/climate-energy/trump-exempts-dozens-coal-plants-mercury-air-toxics-limits-2025-04-15/>

¹⁵ U.S Environmental Protection Agency. (July 17, 2025) EPA Announces Next Set of Actions on Coal Ash Program. <https://www.epa.gov/newsreleases/epa-announces-next-set-actions-coal-ash-program>

¹⁶ Rebecca Bratspies, Allison Cain, Thomas Duffy, et. al. (July 2021). Preventing " Double Disasters" How the U.S. Environmental Protection Agency can protect the public from hazardous chemical releases worsened by natural disasters. <https://cpr-assets.s3.amazonaws.com/documents/preventing-double-disasters-final.pdf>

¹⁷ Coming Clean. (September 29, 2021).Unprepared for Disaster: Chemical Hazards in the Wake of Hurricane Ida. https://comingcleaninc.org/assets/media/documents/Unprepared_for_Disaster_FINAL.pdf

¹⁸ U.S Government of Accountability. (February 28, 2022).Chemical Accident Prevention: EPA Should Ensure Regulated Facilities Consider Risks from Climate Change. <https://www.gao.gov/products/gao-22-104494>

¹⁹ U.S. Chemical Safety Board. *Recommendations*. https://www.csb.gov/recommendations/?F_InvestigationId=3613

²⁰ U. S. House Select Committee on the Climate Crisis. (July 29, 2021). Letter to EPA RE: Urge Consideration of Escalating Hazards to Chemical and Industrial Facilities Due to Climate-Fueled Extreme Events, Particularly on Environmental Justice Communities.

<https://cpr-assets.s3.amazonaws.com/documents/house-select-cmte-climate-crisis-ltr-epa-rmp-rule-improvements-072921.pdf>

Combined with reductions in EPA staffing²¹, cuts to funding for air quality monitoring, environmental justice grants²², and essential programs to support people facing high energy burdens, poor air quality, legacy pollution and limited access to clean energy,^{23,24} these actions including the current proposal to reconsider the 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards violate the mission of the Agency. Moreover, the proposed actions will wreak havoc on the environment and climate globally, but specifically on the communities represented by the undersigned, who are already bearing the brunt of deadly air pollution emissions from a multitude of sources of pollution, crippling exposure to toxics, and ever-increasing effects of climate disasters.

The following comments are submitted by:

Able Differently; Alaska Community Action on Toxics; Alliance of Nurses for Healthy Environments; Backbone Campaign; Beyond Pesticides; Cahaba River Coalition; Center for Biological Diversity; Center for Community Action and Environmental Justice (CCA EJ); Center for Earth Energy & Democracy (CEED); Center for Environmental Health, Chesapeake Climate Action Network, Citizens for a Sustainable Future; Clean+Healthy; Clean Water Action; ClimateMama; Climate Justice Alliance; The Coming Clean Network; Comité de Justicia Ambiental de la Frontera; Communities for a Better Environment; Dana Simmons; Decolonial Praxis Collective; Deep South Center for Environmental Justice; Defend Our Health; Downwinders at Risk; Duwamish River Community Coalition; Earthjustice East Yard Communities for Environmental Justice; Environmental Justice Health Alliance; Environmental Justice Leadership Forum; Environmental Protection Information Center (EPIC); Evergreen Action; Flint Rising; Food & Water Watch; For a Better Bayou; Friends of the Earth; Georgia Conservation Voters; GreenLatinos; Greenbank Associates; The Green Door Initiative; Habitable; The Harambee House/Citizens for Environmental Justice; Hip Hop Caucus; Institute for Local Self-Reliance; Ironbound Community Corporation; League of Conservation Voters; Learning Disabilities Association of America; Learning Disabilities Association of Alabama; Learning Disabilities Association of Arkansas; Learning Disabilities Association of California; Learning Disabilities Association of Georgia; Learning Disabilities Association of Illinois; Learning Disabilities Association of Iowa; Learning Disabilities Association of Maine; Learning Disabilities Association of Maryland; Learning Disabilities Association of Michigan; Learning Disabilities Association of Minnesota; Learning Disabilities Association of New Jersey; Learning Disabilities Association of New York; Learning Disabilities Association of North Carolina; Learning Disabilities Association of South Carolina; Learning Disabilities Association of Texas; Learning Disabilities Association of Utah; Learning Disabilities Association of Virginia; Learning Disabilities Association of Wisconsin; Long Beach Alliance for Children with Asthma; Los Jardines Institute; Mario T.; Memphis APRI; Milwaukee Riverkeeper; Mobile Environmental Justice Action Coalition; Moms for a Nontoxic New York (MNNY); Moving Forward Network; Natural Resources Defense Council; New Jersey Environmental Justice Alliance; North American Climate; Conservation

²¹ Stasia DeMarco. (July 18, 2025). EPA Announces Workforce Cuts, \$748M in Projected Savings.

<https://eponline.com/articles/2025/07/18/epa-announces-workforce-cuts-748m-in-projected-savings.aspx>

²² U.S. Environmental Protection Agency. (March 10, 2025). EPA Administrator Lee Zeldin Cancels 400+ Grants in 4th Round of Cuts with DOGE, Saving Americans More than \$1.7B.

<https://www.epa.gov/newsreleases/epa-administrator-lee-zeldin-cancels-400-grants-4th-round-cuts-doge-saving-americans>

²³ Tracy J. Wholf and Seiji Yamashita. (August 8, 2022). EPA terminates \$7 billion Solar for All program.

<https://www.cbsnews.com/news/epa-considers-ending-solar-for-all-program-funding/>

²⁴ Naveena Sadasivam. (March 9, 2025). Trump calls program to help low-income Americans pay their energy bills ‘unnecessary’ <https://grist.org/energy/trump-calls-low-income-energy-program-unnecessary/>

and Environment (NACCE); NC Climate Justice Collective; New Jersey Environmental Justice Alliance; Occupy Bergen County (New Jersey); Outdoor Promise; People in Defense of Earth and her Resources (PODER); Pesticide Action and Agroecology Network (PAN); Plug In America; Public Citizen; Regional Asthma Management & Prevention (RAMP); Resource Renewal Institute; ReThink Energy Florid; Rise4EJ; Robina Suwol, Executive Director, California Safe Schools (Los Angeles, CA); Rubbertown Emergency ACTION (REACT); Sierra Club; Solutionary Rail; Sowing Justice; Stand.earth; The Sunrise Project; Tallahassee Food Network; Texas Environmental Justice Advocacy Services; Timothy Judson; Tishman Environment and Design Center, The New School; TW; Union of Concerned Scientists; United Electrical Radio and Machine Workers of America (UE); Unity In The Family Ministry; WE ACT for Environmental Justice; West End Revitalization Association - WERA

Introduction

Everyone should have equitable access to clean air and water, nourishing soil, safe and affordable housing, and walkable communities. We all have the right to these things, but instead, people across the country are dying from dirty air and preventable disasters caused by the current climate crisis.²⁵ Ultimately, a person's race²⁶ and zip code are still the best predictors of their health, well-being, and life expectancy.²⁷

In the Duwamish Valley (DV) neighborhoods, part of the 98108 zip code in the Seattle Area, we face poorer air quality than the rest of Seattle because of higher traffic related air pollution and other industrial emissions.²⁸ Our homes here are situated near the Duwamish River, a Superfund site resulting from decades of unmonitored and unregulated toxic pollution and industrial activity. We are bordered by 3 high traffic highways that continue to pollute our air. And as a near port community, emissions from road vehicles and maritime activities add to our air pollution.

Unfortunately, these are all factors that play into our health. Residents in our 98108 zip code have approximately 2.5 times more childhood asthma hospitalizations than wealthier areas in Seattle, some of the highest heart disease mortality rates in the city, and life expectancies 10 years shorter than residents in wealthier areas of Seattle.²⁹

²⁵ Natural Resource Defense Council. (as of Sep. 3, 2025). Learn About the Climate Crisis. <https://www.nrdc.org/climate-crisis>.

²⁶ Tessum, C. W., Paoletta, D. A., Chambliss, S. E., Apte, J. S., Hill, J. D., & Marshall, J. D. (2021). (August 2014). PM2.5 polluters disproportionately and systemically affect people of color in the United States. *Science Advances*, 7(18), eabf4491.

²⁷ Amy Roeder. (August 4, 2014). Zip Code Better Predictor of Health than Genetic Code. <https://www.hsph.harvard.edu/news/features/zip-code-better-predictor-of-health-than-genetic-code/>

²⁸ Schulte, J. K. et al. Neighborhood-Scale Spatial Models of Diesel Exhaust Concentration Profile Using 1-Nitropyrene and Other Nitroarenes. *Environ. Sci. Technol.* 49, 13422–13430 (2015); Gilroy, M., Himes Strange, K. & Yost, M. Tacoma and Seattle Area Air Toxics Evaluation. <https://psccleanair.gov/DocumentCenter/View/145/2010-Tacoma-and-Seattle-Area-Air-Toxics-Evaluation---Full-Report-PDF?bidId=> (2010).; Gould, L. & Cummings, B. Duwamish Valley Cumulative Health Impacts Analysis. <https://www.duwamishcleanup.org/chia> (2013).

²⁹ Larson, T. et al. (2017). Ambient air quality measurements from a continuously moving mobile platform: Estimation of area-wide, fuel-based, mobile source emission factors using absolute principal component scores. *Atmos. Environ.* 152, 201–211 ; Public Health - Seattle & King County, Assessment, Policy Development & Evaluation. (2025).

However, the benefits and regulations that came from the 2009 Endangerment Finding were clearly felt in our community. Since 2010 our asthma hospitalizations have gone down by 40% .³⁰ Following nationwide trends, our asthma hospitalization rates drastically decreased. In addition to the 2009 Endangerment Finding, other strides towards diesel and car emissions reductions, and investments for electric vehicles were directly felt by our community.

I am certain that undermining the Endangerment Finding will also be felt. Our communities will be sicker, our work ethic will be challenged, and our children will suffer. Every day I work with children who have asthma in our community. Only sadness, frustration, and anger come to mind when I think of and talk to the children who will have to visit the hospital more often, with worse conditions, and for preventable reasons that are out of their control. They did not choose this, but our federal leaders, who are reconsidering the Endangerment Finding, are.

Because my community will be one of the many across the country facing these impacts first and most, I ask that the EPA commit itself to its mission and reinforce the Endangerment Finding. We need stronger protections, zero-emissions solutions for freight pollution, and we need them quicker. Our country should not be reconsidering the Endangerment Finding.

More hospital visits, more money wasted, more missed work and school days, and more pollution will not benefit our country. I ask that the federal government and EPA fight for more air pollution protections in our homes, roads, workplaces, and schools.

- Joseph Santana, Environmental Health Manager, Duwamish River Community Coalition³¹

The EPA is a federal agency tasked with protecting human health and the environment.³² This reversal of the Endangerment Finding and GHG Vehicle Standards is an abdication of EPA's mission to protect human health and the environment. By attempting to revoke the Endangerment Finding, the EPA is denying people the most basic human rights to clean air and clean water. The climate denialism embedded in this proposal is an attempted erasure of environmental justice, disregarding the lived experiences of communities already on the front- and fence- lines of pollution and climate impacts. Rolling back key climate protections and gutting funding for extreme weather response only make it harder for communities experiencing a disproportionate burden of the impacts. We have spent years relying on promises that the climate crisis will be solved—meanwhile, our own government is threatening the EPA's ability to limit carbon and other pollutants that accelerate the climate crisis.³³

³⁰ Ibid.

³¹ The italicized testimonials were submitted in writing to be included in these written comments in response to the U.S. Environmental Protection Agency's Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards Docket No. EPA-HQ-OAR-2025-0194 (September 22, 2025)

³² David Doniger. (as of Sep. 3, 2025). The EPA's Endangerment Finding <https://www.nrdc.org/resources/epas-endangerment-finding#:~:text=The%20endangerment%20finding%20reflects%20the%20overwhelming%20scientific%20evidence,comments%20and%20was%20upheld%20by%20the%20federal%20courts.>

³³ David Doniger. (August 14, 2025). Can Trump Reverse the Climate Endangerment Finding?. <https://www.nrdc.org/bio/david-doniger/can-trump-reverse-climate-endangerment-finding#massvepa>

This proposed rollback is directly contrary to overwhelming scientific consensus, well-established evidence, and the undeniable daily realities faced by our communities.³⁴ The EPA is proposing through this docket to ignore science, further extractivism and sacrifice zones (areas with high levels of pollution and environmental hazards, from nearby industrial and/or freight related facilities where the health and safety of people in these communities is being effectively sacrificed for the economic gains and prosperity of industry),³⁵ and bring us back to a time in history when the skies were blacked by smoke, bodies of water were dumping ground for legacy toxins, and people were being poisoned without any accountability and knowledge.³⁶ Historically, frontline and fenceline communities have advocated for the critical changes necessary to eliminate the pollution and public health impacts caused by the myriad pollution sources that affect frontline and fenceline communities every day.

Our Networks, the Moving Forward Network (MFN)³⁷, Climate Justice Alliance (CJA)³⁸, The Equitable & Just National Climate Platform (EJNCP)³⁹, Environmental Justice Health Alliance for Chemical Policy Reform⁴⁰, and Environmental Justice Leadership Forum⁴¹, through our member organizations, represent

³⁴ Rachel Cleetus. (April 9, 2025). Zeldin Wants to “Reconsider” the EPA’s GHG Endangerment Finding. He Can’t Bury the Facts on Climate Science. <https://blog.ucs.org/rachel-cleetus/zeldin-wants-to-reconsider-the-epas-ghg-endangerment-finding-he-cant-bury-the-facts-on-climate-science/>

³⁵ Robert D. Bullard. Sacrifice Zones: The Front Lines of Toxic Chemical Exposure in the United States. *Environ Health Perspect.* June 2011(6):A266. PMID: PMC3114843.

³⁶ Kendra Pierre-Louis. This is what America looked like before the EPA cleaned it up: It wasn’t pretty. (February 25, 2017). <https://www.popsci.com/america-before-epa-photos/>

³⁷ The Moving Forward Network (MFN) is a national network of over 50 member organizations that centers grassroots, frontline-community knowledge, expertise and engagement from communities across the US that bear the negative impacts of the global freight transportation system. MFN builds partnerships between these community leaders, academia, labor, big green organizations, and others to protect communities from the impacts of freight. Its diverse membership facilitates an integrated and geographically dispersed advocacy strategy that incorporates organizing, communications, research, legal and technical assistance, leadership development and movement building. This strategy respects multiple forms of expertise and builds collective power. The Moving Forward Network, is a project of Windward Fund <https://www.movingforwardnetwork.com/>

³⁸ Climate Justice Alliance (CJA) is a member based organization with 99 members representing frontline environmental justice and Tribal organizations across the U.S. and its territories, including Guam, Puerto Rico and Indigenous territories. Our translocal organizing strategy is to build a Just Transition towards resilient, regenerative, and equitable economies. <https://climatejusticealliance.org/>

³⁹ The Equitable & Just National Climate Platform (EJNCP) is a coalition of EJ groups and national environmental organizations from across the country united around a shared commitment to ending the environmental racism that has left economically disadvantaged communities, Indigenous communities, Black communities, and communities of color exposed to disproportionate levels of toxic pollution and bearing the brunt of the climate crisis. Our coalition has stood strong for over five years around our shared vision for a just climate future — and our platform has grown to include over 300 co-signer organizations from all over the country.

<https://ajustclimate.org/#:~:text=What%20is%20the%20Equitable%20and,while%20tackling%20the%20climate%20crisis.>

⁴⁰ The Environmental Justice Health Alliance for Chemical Policy Reform (EJHA) is a national network of grassroots Environmental and Economic Justice organizations and advocates in communities that are disproportionately impacted by toxic chemicals from legacy contamination, ongoing exposure to polluting facilities and health-harming chemicals in household products. The EJHA network model features leadership of, by, and for Environmental Justice groups with support from additional allied groups and individual experts. We are rooted in the history of the Environmental and Economic Justice Movement. EJHA hosts a network of grassroots affiliates from states across the country that are disproportionately impacted who are working on place-based issues in their communities and unite to work towards policy reform initiatives to create a just transition to a pollution-free economy that leaves no community or worker behind. We are dedicated to chemical safety and supporting safe, healthy, and toxic-free communities where we live, work, play, pray and go to school.

⁴¹ The Environmental Justice Leadership Forum (EJLF) (ejforum.org) is a national coalition of nearly 40 organizations in 22 states working together to advance environmental and climate justice and ensure the health and well-being of communities of color and low-income communities throughout the United States is centered in federal, state, and local programming and policy decisions.

the millions of people living in frontline and fenceline communities across the United States. As networks, we and our members have publicly and consistently supported the EPA's authority and responsibility to implement the most stringent and protective standards that eliminate the daily toxic threats to our communities. The proposal to revoke the Endangerment Finding and GHG Vehicle Standards hinders the EPA's power to regulate greenhouse gas emissions from vehicles, power plants, and other major polluters. This act flies in the face of decades of what science, frontline and fenceline communities and workers have always known: that pollution poses a direct and growing threat to human life.⁴² As a result, we continue to remind the EPA of the importance of incorporating a justice framework into the regulatory process and advocate for the strongest and most protective standards. It is under this commitment that we oppose the EPA's flawed proposal to rescind its 2009 Endangerment Finding and GHG Vehicle Standards. Our reasons include:

1. The proposal denies the lived experience, backed by science, of the effects of pollution on public health, the environment, and the climate.
2. The proposal does not consider the targeted and harmful effects that this "historic deregulation" effort will have on workers.
3. The proposal is based on flawed science.
4. The proposal is unlawful.
5. The proposal does not consider the benefits of climate and environmental protection.

As detailed below, the excessive burden of negative health and economic impacts concentrated in frontline and fenceline communities, which are majority Black, Indigenous, and people of color (BIPOC) and low-income communities, is indisputable. These communities suffer as a direct result of environmental racism caused by the impacts from residential redlining⁴³ and other types of racial discrimination often coupled with the historical hazard siting of polluting facilities, and the diesel emissions from thousands of daily truck trips traversing their streets.

EJ [environmental justice] Communities have always relied on ourselves in matters of equity and justice. The places we live were designed to be repositories of pollution. The gains made over the past decades have been a result of fearless and unceasing dedication to clean and healthy air, soil and water. Even this won't change that.

-Melissa Miles, New Jersey Environmental Justice Alliance⁴⁴

The research is clear that there is a direct correlation between health disparities and the multitude of pollution sources, including those caused by the freight transportation sector (such as medium and heavy-duty trucks, cargo handling equipment, warehouses, rail, and marine vessels). Their effects, coupled with

Organizations are based in red, blue, and swing states, including those in Appalachia, the Deep South, Northwest, Midwest, Northeast and Southwest regions. EJLF members represent Black, Latinx, Indigenous and low-income communities in large cities to rural areas. The EJLF is hosted by WE ACT for Environmental Justice (weact.org).

⁴² Rachel Cleetus. (August 11, 2025). Why the EPA's Latest Move Could Worsen the Climate Crisis <https://blog.ucs.org/rachel-cleetus/why-the-epas-latest-move-could-worsen-the-climate-crisis/>

⁴³ Lane, H. M., Morello-Frosch, R., Marshall, J. D., & Apte, J. S. (2022). *Historical redlining is associated with present-day air pollution disparities in U.S. cities*. Environmental Science & Technology Letters, 9(4), 345–350. <https://doi.org/10.1021/acs.estlett.1c01012>

⁴⁴ The italicized testimonials were submitted in writing, to be included in these written comments in response to the U.S. Environmental Protection Agency's Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards Docket No. EPA-HQ-OAR-2025-0194 (September 22, 2025)

legislation and policies that neither ensure health nor protect overburdened communities, have resulted in generational impacts that shorten a person's lifespan and quality of life. Though the consequences won't be felt equally, abdicating EPA's authority to regulate climate pollution is an attack on all of us—and is equivalent to a back-room deal with the fossil fuel industry to prioritize their profits over our health and our children's future. Communities across the U.S are counting on the EPA to do its job and do what is right. We need the EPA to stop proposing to revoke critical regulations, renew its commitments to environmental justice, reinstate essential funding, and commit to creating regulations that protect current and future generations.

The proposal denies the lived experience, backed by science, of the effects of pollution on public health, the environment, and the climate.

Public Health and Environment

For decades, communities across the country have been fighting for the right to breathe clean air. Environmental racism and a lack of strong health-protective policies have meant that people living and working in these frontline and fenceline communities are being forced to hold their breath, literally. Frontline and fenceline communities not only disproportionately experience the worst effects of the climate crisis, but they are also plagued by harmful air pollution, including from vehicles and other engines. The American Lung Association's 2025 State of the Air Report found that nearly half of all Americans live in a county with unhealthy levels of ozone or particulate pollution,⁴⁵ leading to adverse health impacts, from respiratory and cardiovascular issues to cancer, pre-term births, and premature death.⁴⁶ It is frontline and fenceline communities who unduly shoulder the heaviest health and pollution burdens due to a legacy of discriminatory policies and practices, that resulted in the siting of freight infrastructure and the operation of polluting industries in their neighborhoods.^{47,48} In fact, a 2021 analysis showed that regardless of location and income, Black and Brown populations are disproportionately and chronically exposed to higher-than-average particulate matter (PM) from nearly every major source of pollution.⁴⁹

I live in the Duwamish Valley, a place that has always been rich in culture, resilience, and community. But it's also a place where pollution is a daily reality.

⁴⁵ American Lung Association. Key Findings Learn the key findings and overall trends about air quality in states and cities in the American Lung Association's State of the Air report. <https://www.lung.org/research/sota/key-findings>

⁴⁶ American Lung Association, (2020). Disparities in the Impact of Air Pollution, <https://www.lung.org/clean-air/outdoors/who-is-at-risk/disparities>

⁴⁷ Cushing, L. J., Li, S., Steiger, B. B., & Casey, J. A. (2023). Historical red-lining is associated with fossil fuel power plant siting and present-day inequalities in air pollutant emissions. *Nature Energy*, 8(1), 52–61. <https://doi.org/10.1038/s41560-022-01162-y>

⁴⁸ Donaghy, T. Q., Healy, N., Jiang, C. Y., & Battle, C. P. (2023). Fossil fuel racism in the United States: How phasing out coal, oil, and gas can protect communities. *Energy Research & Social Science*, 100, 103104. <https://doi.org/10.1016/j.erss.2023.103104>

⁴⁹ Tessum, C. W., Paoletta, D. A., Chambliss, S. E., Apte, J. S., Hill, J. D., & Marshall, J. D., 2021. PM_{2.5} polluters disproportionately and systemically affect people of color in the United States. *Science Advances*, 7(18), eabf4491.; Pablo Knobel, Inhye Hwang, Edgar Castro, Perry Sheffield, Louisa Holaday, Liuhua Shi, Heresh Amini, Joel Schwartz, Maayan Yitshak Sade. Socioeconomic and racial disparities in source-apportioned PM_{2.5} levels across urban areas in the contiguous US, 2010, *Atmospheric Environment*, Volume 303, 2023, 119753, ISSN 1352-2310, <https://doi.org/10.1016/j.atmosenv.2023.119753>; Geldsetzer, P., Fridljand, D., Kiang, M.V. et al. Disparities in air pollution attributable mortality in the US population by race/ethnicity and sociodemographic factors. *Nat Med* 30, 2821–2829 (2024). <https://doi.org/10.1038/s41591-024-03117-0>

We breathe air filled with diesel from freight trucks and industrial operations that never seem to stop. Our neighborhoods are surrounded by heavy industry, and many of us live just blocks away from facilities that release toxic chemicals. The soil, the water, and even the air our kids play in have been contaminated for generations. And yet, we're still here—fighting, working, building a future.

This isn't just about statistics. It's about the headaches, the asthma, the unexplained illnesses. It's about our elders, our children, our families who are disproportionately impacted by pollution every single day. The impacts of climate change are already here—more flooding, hotter summers, and less clean water—and our community is on the frontlines.

That's why I'm speaking out.

We cannot afford to go backward. When the EPA weakens or revokes critical environmental regulations, it sends a message that our health doesn't matter. That our neighborhoods don't count. But we do count. We need stronger -- not weaker-- protections against pollution from freight, facilities, and toxic waste. We need environmental justice to mean something. These regulations are not red tape; they are lifelines. Lifelines for cleaner air, safer water, and a livable future for our children.

EPA must act now. Not later. Not after more studies. Not after more suffering.

Hold polluters accountable. Protect frontline communities like ours. And stop rolling back the very protections meant to safeguard our health, our environment, and our future.

We deserve clean air. We deserve a safe home. We deserve justice, we deserve human rights!

- Paulina Lopez, Duwamish River Community Coalition⁵⁰

Diesel is the most harmful engine fuel. The World Health Organization found diesel exhaust as “carcinogenic to humans” in 2012. An EPA analysis found that 72 million people, many of whom are low-income and people of color, live within 200 meters of major trucking routes.⁵¹ These communities disproportionately experience some of the worst impacts of the climate crisis,⁵² such as Hurricane Helene, Harvey, Maria, Superstorm Sandy, extreme heatwaves, flooding, wildfires, and devastating winter storms,⁵³ etc.. As well as they are often unduly burdened by harmful tailpipe emissions from trucks because they live near “diesel death zones” – ports, highways, distribution centers, and other

⁵⁰ The italicized testimonials were submitted in writing to be included in these written comments in response to the U.S. Environmental Protection Agency's Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards Docket No. EPA-HQ-OAR-2025-0194 (September 22, 2025).

⁵¹ Environmental Protection Agency. (March 2022). Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards Draft Regulatory Impact Analysis. <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P10144K0.pdf>

⁵² Environment America Research and Policy Center. (January 7, 2024). There were 27 major climate-related disasters in the U.S. in 2024. <https://environmentamerica.org/center/updates/there-were-24-major-climate-related-disasters-in-the-u-s-in-2024/>; Berberian AG, Gonzalez DJX, Cushing LJ. Racial Disparities in Climate Change-Related Health Effects in the United States. *Curr Environ Health Rep.* 2022 Sep;9(3):451-464. doi: 10.1007/s40572-022-00360-w. Epub 2022 May 28. PMID: 35633370; PMCID: PMC9363288.; Gamble, J.L., et al. (2016). Ch. 9: Populations of concern. In: *The impacts of climate change on human health in the United States: A scientific assessment*. U.S. Global Change Research Program, Washington, DC, p. 253.

⁵³ Judah Cohen et al. ,Linking Arctic variability and change with extreme winter weather in the United States.*Science*373,1116-1121(2021).DOI:10.1126/science.abi9167

transportation infrastructure.^{54,55} Communities like Mira Loma, California, a predominantly low-income Latino neighborhood, suffer chronic health problems, certainly influenced by a constant exposure to diesel truck traffic from surrounding warehouse districts and transportation infrastructure.⁵⁶ Living near these areas results in heightened exposure to diesel pollution from trucks and buses. This pollution contains a toxic mix of nitrogen oxides (NO_x), fine particulate matter (PM_{2.5}), carbon monoxide (CO), volatile organic compounds (VOC), heavy metals, and carcinogens like benzene, all of which are linked to elevated rates of respiratory illness, cardiovascular disease, and premature death.^{57,58} NO_x and VOCs from vehicles and industrial sources interact with sunlight and heat to form ground-level ozone, which is extremely harmful to health, especially for people with underlying conditions like asthma, as well as children and seniors.⁵⁹ As climate change leads to more high-heat days, communities like Long Beach—and many others—get more high ozone days when it is dangerous just to breathe or be outside.

I have lived in Long Beach all of my life. At the age of 7, I was diagnosed with asthma. This came as a direct result of living in a community filled with and surrounded by toxic pollution - two ports, a freeway, industrial manufacturing, refineries, rail yards. My life has been turned inside out because of the health impacts I've experienced. Revoking these regulations will increase the harm, both to public health and financial, that my community and other communities across the U.S. face due to extreme exposure to unmitigated pollution. Economically, this will impact millions of people and affect their ability to attend school and go to work. We can't afford this action. –Taylor Thomas, East Yard Communities for Environmental Justice⁶⁰

Diesel exhaust contains smog precursors, fine particulate matter—which can be inhaled and lodged in the lungs—and more than 40 known cancer-causing compounds.⁶¹ Exposure to pollution from diesel-powered vehicles has also been linked to low birth rate, premature birth, lower IQ, diabetes, stroke, congestive heart failure, heart disease, obesity, asthma, and allergies.⁶² Diesel exposure leads to tens of

⁵⁴ Kristoffer Tighe. (October 27, 2021). Diesel Emissions in Major US Cities Disproportionately Harm Communities of Color, New Studies Confirm

<https://insideclimatenews.org/news/27102021/diesel-pollution-environmental-justice/>

⁵⁵ Clean Air Taskforce. Deaths by Dirty Diesel.

<https://www.catf.us/deathsbydiesel/>

⁵⁶ Mike Kane. (January 10, 2020). Seeking environmental justice in California's 'diesel death zones'

<https://grist.org/array/seeking-environmental-justice-in-californias-diesel-death-zones/>

⁵⁷ California Air Resource Board. Overview: Diesel Exhaust. [https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health#:~:text=Examples%20of%20these%20chemicals%20include,of%20nitrogen%20\(NOx\).](https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health#:~:text=Examples%20of%20these%20chemicals%20include,of%20nitrogen%20(NOx).)

⁵⁸ Demetillo, M. A. G., Harkins, C., McDonald, B. C., Chodrow, P. S., Sun, K., & Pusede, S. E. (2021). Space-based observational constraints on NO₂ air pollution inequality from diesel traffic in major US cities. *Geophysical Research Letters*, 48(17), e2021GL094333.

⁵⁹ U.S. Environmental Protection Agency. (2022). How Climate Change May Impact Ozone Pollution and Public Health through the 21st Century.

<https://www.epa.gov/sciencematters/how-climate-change-may-impact-ozone-pollution-and-public-health-through-21st-century>

⁶⁰ The italicized testimonials were submitted in writing to be included in these written comments in response to the U.S. Environmental Protection Agency's Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards Docket No. EPA-HQ-OAR-2025-0194 (September 22, 2025).

⁶¹ California Air Resources Board. (last accessed: May 4, 2022). Summary: Diesel Particulate Matter Health Impacts.

<https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts>.

⁶² Wilhelm, Michelle, et al. (August 2011). Traffic-Related Air Toxics and Term Low Birth Weight in Los Angeles County, California. *Environmental Health Perspectives*. Vol. 120. No. 1. doi:10.3897/bdj.4.e7720.figure2f; Christopher S. Malley, Johan C.I. Kuylenstierna, Harry W. Vallack, Daven K. Henze, Hannah Blencowe, Mike R. Ashmore. Preterm birth associated with maternal fine particulate matter exposure: A global, regional and national assessment. *Environment International*. (2017); Perera, Frederica, et al. Prenatal Airborne Polycyclic Aromatic Hydrocarbon Exposure and Child IQ at Age 5 Years. *Pediatrics*. Vol. 124. No. 2. (Aug. 2009). p. 195–203. doi:10.1542/peds.2008-3506 ; ZJ, Andersen, et al. Diabetes incidence and long-term exposure to air pollution: a cohort study. *Diabetes Care*. Vol. 35. No. 1. (January 2012). p. 92-98. doi: 10.2337/dc11-1155; T., To et al. Chronic disease prevalence in women and air pollution--A 30-year longitudinal cohort study. *Environmental International*. Vol. 80. (July 2015). p. 26-32. doi: 10.1016/j.envint.2015.03.017; Dong, Guang-Hui, et al. Ambient Air Pollution and the Prevalence of Obesity in Chinese Children: The Seven Northeastern Cities Study. *Obesity*. Vol. 22. p. 795-800, doi:

thousands of premature deaths each year.⁶³ For residents of environmental justice communities, their lives can be 10 to 20 years shorter because of environmental pollution compared to residents in wealthy white communities.⁶⁴ Nationally, in the counties with the worst air quality, 72% of the 18 million residents are people of color, compared to the 28% who are white.⁶⁵ For example, in Kansas City, Missouri, public health data demonstrates that the life expectancy difference is between 15 and 18 years depending on the neighborhood you live in. “A 2016 study of health outcomes in Wyandotte County, Kansas, revealed a stark 22-year difference in life expectancy between residents of the heavily industrialized neighborhood of Armourdale, which is predominantly communities of color and areas with high environmental burdens, and those living in other parts of the county.”⁶⁶ Kansas City, like many other parts of the nation, experiences high-risk zip codes where asthma, heart disease, and cancer are above the national average, and these are the same areas that are sliced by highways and rail systems and are adjacent to chemical facilities.

The EPA’s Endangerment Finding provides a critical scientific basis for regulating greenhouse gas emissions including vehicles, which is fundamental to the U.S. climate protection policy. Transportation (passenger and commercial vehicles, ships, rail, and aviation) releases nearly one-third of all greenhouse gas emissions nationally.⁶⁷ Diesel exhaust contains carcinogens and toxic air pollutants that significantly affect the health of communities living in close proximity to truck tailpipe pollution. Additionally, as many as 40% of U.S. ports and many other freight facilities are in areas that are not achieving federal clean air standards for ozone and particulate matter pollution, and freight operations have been identified as significant contributors to nonattainment.⁶⁸ Vehicle regulations have been proven to reduce air pollutants that cause respiratory and cardiovascular harm while cutting climate-wrecking emissions.⁶⁹ Rolling back these protections will only worsen outcomes for those already most vulnerable—children, elders, people with pre-existing conditions, and frontline residents exposed to cumulative impacts of pollution from industry, highways, and fossil fuel infrastructure. Furthermore, EPA has not considered the

doi:10.1002/oby.20198; Finkelman, Fred. Diesel exhaust particle exposure during pregnancy promotes development of asthma and atopy. *The Journal of Allergy and Clinical Immunology*. Vol. 134, issue 1. p. 73-74, doi: 10.1016/j.jaci.2014.04.002.

⁶³ Clean Air Task Force.(January 20, 2022). Diesel pollution is a deadly problem in the United States. <https://www.catf.us/2022/01/diesel-pollution-deadly-problem-united-states/> ; Phys.org, Nearly 50% of transport pollution deaths linked to diesel: study. (Feb. 27, 2019). <https://phys.org/news/2019-02-pollution-deaths-linked-diesel.html>; International Agency for Research on Cancer, World Health Organization. Diesel Engine Exhaust Carcinogenic. (June 12, 2012). www.iarc.fr/en/media-centre/pr/2012/pdfs/pr213_E.pdf; see also Kristina W. Whitworth, Elaine Symanski, and Ann L. Coker, Childhood Lymphohematopoietic Cancer Incidence and Hazardous Air Pollutants in Southeast Texas, 1995-2004, *Envtl. Health Perspectives*, Vol. 116 No. 11 (November 2008), 1576-1580.

⁶⁴ Genna Reed, Beto Lugo-Martinez, and Casey Kalman. *Environmental Racism in the Heartland: Fighting for Equity and Health in Kansas City*. (2021). Cambridge, MA: Union of Concerned Scientists. <https://doi.org/10.47923/2021.14322>; Dwyer-Lindgren L, Bertozzi-Villa A, Stubbs RW, et al. Inequalities in life expectancy among US counties, 1980 to 2014: temporal trends and key drivers. *JAMA Intern Med* 2017; 177: 1003–11.

⁶⁵ American Lung Association. (last accessed: June 1, 2023). 2023 State of the Air, Key Findings. <https://www.lung.org/research/sota/key-findings> ; Wyandotte, Kansas. County Health Rankings & Roadmaps. (n.d.). <https://www.countyhealthrankings.org/explore-health-rankings/kansas/wyandotte?year=2023> (last accessed: June 7, 2023)

⁶⁶ Genna Reed, Beto Lugo-Martinez, and Casey Kalman. (2021). *Environmental Racism in the Heartland: Fighting for Equity and Health in Kansas City*. Cambridge, MA: Union of Concerned Scientists. <https://doi.org/10.47923/2021.14322>.

⁶⁷ Environmental Protection Agency, Fast Facts on Transportation Greenhouse Gas Emissions, 2022 U.S. GHG emissions by sector, <https://www.epa.gov/greenvehicles/fast-facts-transportation-greenhouse-gas-emissions>

⁶⁸ Moving Forward Network. (May 2021). *Making the Case for Zero-Emission Solutions in Freight: Community Voices for Equity and Environmental Justice*, p.3 https://www.movingforwardnetwork.com/wp-content/uploads/2021/10/MFN_Making-the-Case_Report_May2021.pdf.

⁶⁹ U.S. EPA Press Office. (March 20, 2024). “What they are saying: Strongest-ever pollution standards for cars will reduce pollution, create jobs, cut costs, and ensure companies and workers lead the clean vehicle future”. <https://www.epa.gov/newsreleases/what-they-are-saying-strongest-ever-pollution-standards-cars-will-reduce-pollution>.

significant reliance interests of frontline communities that have depended on EPA to pass regulations to push motor vehicle manufacturers to develop cleaner vehicles.⁷⁰

The initial mandate from the Clean Air Act, which was signed into law in 1970 by bipartisan support, made a clear commitment to protect clean air⁷¹ for “future generations of America”.⁷² The Clean Air Act (CAA) requires the EPA to protect people from “any air pollutant” that the agency finds “causes, or contributes to, air pollution that may reasonably be anticipated to endanger public health or welfare.”⁷³ Over time, there have been additions or amendments to strengthen the CAA, such as, in 1990, adding amendments to better combat sky-high cancer risk from hazardous air pollutants (HAPs).⁷⁴ This is a set of National Emissions Standards for Hazardous Air Pollutants (NESHAP) for “source categories” of facilities and revisit them at least every 8 years to ensure they are protective enough.⁷⁵ What remains clear through historic actions and bipartisan efforts is that there should be support for increasing the capacity and regulatory resources within the EPA. Scientists have continued to study and reaffirm what frontline and fenceline communities have been saying all along, that pollution affects their lives, health, environment. However, by under-resourcing the EPA and revoking critical regulations, we are risk further irreparable damage the climate, putting all of our lives at risk from increases in climate disasters. Instead of stripping away protections, the EPA should strengthen these rules and adhere to the precautionary approach, putting protections in place that aim to prevent, minimize, and ultimately eliminate harm.⁷⁶

The risks of harm to the environment, like the public health risks, are not evenly distributed across the nation’s population. Instead, both climate disruption and pollution unduly harm the young, the elderly, people with chronic health conditions, minorities, and people with lower wealth.⁷⁷ BIPOC people are disproportionately impacted by climate change and associated pollution, and they have fewer resources and less institutional support with which to respond to external hazards.⁷⁸ These vulnerabilities will be exacerbated for people living or working in communities with harmful air pollution from nearby

⁷⁰ *F.C.C. v. Fox Television Stations, Inc.*, 556 U.S. 502, 515–16 (2009)

⁷¹ Shelia Hu. The Clean Air Act 101. (August 11, 2025). <https://www.nrdc.org/stories/clean-air-act-101>

⁷² Online by Gerhard Peters and John T. Woolley, The American Presidency Project. Richard Nixon, Remarks on Signing the Clean Air Amendments of 1970. <https://www.presidency.ucsb.edu/node/240828>

⁷³ See 42 U.S.C. § 7521 (a)(1) (“The Administrator shall by regulation prescribe (and from time to time revise) in accordance with the provisions of this section, standards applicable to the emission of any air pollutant from any class or classes of new motor vehicles or new motor vehicle engines, which in his judgment cause, or contribute to, air pollution which may reasonably be anticipated to endanger public health or welfare.”)

⁷⁴ U.S. Environmental Protection Agency. (November 12, 2024). Evolution of the clean air act. <https://www.epa.gov/clean-air-act-overview/evolution-clean-air-act>

⁷⁵ U.S. Environmental Protection Agency. (January 14, 2025). National Emission Standards for Hazardous Air Pollutants Compliance Monitoring. <https://www.epa.gov/compliance/national-emission-standards-hazardous-air-pollutants-compliance-monitoring>

⁷⁶ The precautionary approach (basically, “better safe than sorry”) turns traditional environmental policy on its head. Instead of asking, “How much harm is allowable?” The precautionary approach asks us to consider, “How little harm is possible?” The precautionary approach urges a full evaluation of available alternatives for the purpose of preventing or minimizing harm.” Rachel’s Democracy & Health News (formerly Rachel’s Environment & Health News). (May 29, 2003). #770 -- Environmental Justice and Precaution, http://web.archive.org/web/20071219020722/http://www.rachel.org:80/bulletin/index.cfm?issue_ID=2359

⁷⁷ Environmental Protection Agency, Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act (Dec 15 2009) 74 Fed Reg at 66498, <https://www.federalregister.gov/documents/2009/12/15/E9-29537/endangerment-and-cause-or-contribute-findings-for-greenhouse-gases-under-section-202a-of-the-clean>.

⁷⁸ Thilagawathi Abi Deivanayagam, et al, Envisioning environmental equity: climate change, health and racial justice, Health Policy, Lancet (2023) 402:64-78. [https://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736\(23\)00919-4.pdf](https://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736(23)00919-4.pdf)

roadways, warehouses, ports, airports, and rail lines.⁷⁹ Among the worst offenders are the power and transportation sectors, which together account for over half of all greenhouse gas emissions⁸⁰ and have long concentrated their harms in at-risk communities. As they burn fossil fuels, the transportation and power sectors emit not only greenhouse gases but also emit other health-harming co-pollutants.

“The EPA’s mission is to ‘protect human health and the environment,’ ensuring that ‘Americans have clean air, land, and water’ with efforts to ‘reduce environmental risks’ being ‘based on the best available scientific information.’ The decision to rescind the Endangerment Finding and limits on tailpipe emissions is an absolute rejection of its mission and responsibility to Americans to safeguard them from toxic chemicals and environmental contamination and illness in favor of standing with and promoting harmful industry lies and propagating fossil fuel expansion.

- Ayo Wilson, Co-Director at West End Revitalization Association⁸¹

Decades of public health data have shown that throughout the country, living near fossil fuel operations greatly contributes to increased exposure to toxic air pollutants like nitrogen oxides (NOx), sulphur dioxides, particulate matter, mercury, and other hazardous air pollutants.⁸² These emissions lead to higher rates of respiratory, reproductive, and other health issues, which in turn ultimately result in devastating outcomes such as cancer and premature death.⁸³ Across all stages of the oil and gas production cycle, 91,000 people each year die prematurely because of air pollution, with a disproportionate share of these deaths among people from marginalized groups.⁸⁴ Health risks associated with regulated and underregulated toxic air emissions and exposures remain high, particularly near sources of such toxic emissions, such as ports and transportation corridors.⁸⁵ This is well demonstrated in St. John Parish, a predominantly Black community located in the part of Louisiana referred to as “Cancer Alley.”⁸⁶ In this region, the risk of developing cancer from air pollution in the census tracts closest to fossil fuel and petrochemical facilities

⁷⁹ Princeton University. Racial Disparities and Climate Change. (August 15, 2020).

<https://psi.princeton.edu/tips/2020/8/15/racial-disparities-and-climate-change>; See also: Gibson Oworo Ofremu, et al, Exploring the relationship between climate change, air pollutants and human health: Impacts, adaptation, and mitigation strategies, Green Energy and Resources 3:2: 100074, (June 2025), <https://www.sciencedirect.com/science/article/pii/S2949720524000286>

⁸⁰ U.S. Environmental Protection Agency. (2024). Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2022: EPA 430-R-24-004. <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2022>.

⁸¹ Ashley Sullivan, WeAct for Environmental Justice. (July 30, 2025). Advocates to EPA: Fulfill Your Obligation to Protect Vulnerable Communities from Climate and Transportation Pollution. <https://weact.org/updates/environmental-justice-advocates-to-epa-fulfill-your-obligation-to-protect-vulnerable-communities-from-climate-and-transportation-pollution/>

⁸² U.S. Environmental Protection Agency. (February 6, 2025). Human Health & Environmental Impacts of the Electric Power Sector. <https://www.epa.gov/power-sector/human-health-environmental-impacts-electric-power-sector#:~:text=Human%20Health%20Impacts,variety%20of%20adverse%20health%20effects>.

⁸³ Jess Beagley. (2025). Cradle to grave: The health harms of fossil fuel dependence and the case for a just phase-out. Global Climate and Health Alliance. https://climateandhealthalliance.org/sdm_downloads/cradle-to-gravethe-health-harms-of-fossil-fuel-dependence-and-the-case-for-a-just-phase-out/

⁸⁴ Vohra, K., Marais, E. A., Achakulwisut, P., Anenberg, S., & Harkins, C. (2025). The health burden and racial-ethnic disparities of air pollution from the major oil and gas lifecycle stages in the United States. *Science Advances*, 11(34), eadu2241. <https://doi.org/10.1126/sciadv.adu2241>

⁸⁵ Clarity Movement Co. (March 19, 2024). Air quality challenges and solutions for ports and logistics operations. <https://shorturl.at/aHTMZ>; Ryan Atkins Sarah Davidson Jenny Drzewiecki, et. al. (September 21, 2023). The EPA Needs to Address Increasing Air Pollution at Ports. . <https://shorturl.at/n9J7Y>.

⁸⁶ University Network for Human Rights. (2019). “Waiting to Die: Toxic Emissions and Disease Near the Louisiana Denka/DuPont Plant”. https://www.epa.gov/sites/default/files/2019-12/documents/waiting_to_die_final.pdf

is nearly 50 times the national average.⁸⁷ Addressing this growing threat requires a strong commitment to long-term emissions reductions, not rolling back the already insufficient protections these communities rely on.

The sprawling freight transportation system spews daily toxic emissions into adjacent communities. This web of fossil-fueled equipment and seaport/dry port infrastructure burns human lungs with toxic pollution and extreme heat while destroying natural ecosystems. Ports across the U.S. are magnets for diesel-fueled ocean-going vessels, tugboats, terminal expansion projects, and harbor craft.⁸⁸ People of color disproportionately breathe dirtier air than white people do.⁸⁹ In the Northeast and the Mid-Atlantic region, communities of color breathe on average 66% more fine PM pollution than white residents. The average concentrations of exposure to PM pollution from vehicles are 75%, 73%, and 61% higher for Latino, Asian American, and African American residents, respectively.⁹⁰

The South Coast Air Quality Management District's MATES V study found that individuals who live in the zip codes nearest to California's San Pedro Bay port complex are in the 97th-99th percentile of cancer risk from air toxins.⁹¹ This extreme pollution burden is only made worse by extreme weather events, including intensifying heat waves, heavier rainfall that moves toxic runoff into communities, and flooding freeways and neighborhoods.⁹² Considering the ongoing challenges with air quality and the recent increase in wildfires throughout California, the cumulative impacts of GHG emissions and other factors are particularly harmful to port communities like Los Angeles and Long Beach. Given that wildfires emit GHGs, black carbon, and other harmful air pollutants,⁹³ the Harbor Region of Los Angeles faces cumulative impacts⁹⁴ from fire on top of chronic pollution that already endangers their health and safety. In the most recent wildfires that devastated Los Angeles, port operations continued even as homes burned, and communities suffered.

Similarly, fossil-fueled locomotives have been harming frontline communities for generations. For ports, exposure to emissions from one train is more dangerous to human health than being exposed to emissions

⁸⁷ Ibid

⁸⁸ California Air Resources Board. (2024). *California Greenhouse Gas Emissions from 2000 to 2022: Trends of Emissions and Other Indicators*. https://ww2.arb.ca.gov/sites/default/files/2024-09/nc-2000_2022_ghg_inventory_trends.pdf; see also California Air Resources Board. (last visited May 4, 2025). Current California GHG Emission Inventory Data. <https://ww2.arb.ca.gov/ghg-inventory-data>.

⁸⁹ Tessum, C. W., Paolella, D. A., Chambliss, S. E., Apte, J. S., Hill, J. D., & Marshall, J. D. (2021). PM2.5 polluters disproportionately and systemically affect people of color in the United States. *Science Advances*, 7(18), eabf4491.

⁹⁰ Ibid.

⁹¹ South Coast Air Quality Management District. (2021). *Multiple Air Toxics Exposure Study V*. <https://www.aqmd.gov/docs/default-source/planning/mates-v/mates-v-final-report.pdf?sfvrsn=4>.

⁹² Hannah Fry. Heat wave gives way to late-summer thunderstorms as California's extreme weather continues - Los Angeles Times. (Sept. 2, 2025). <https://www.latimes.com/california/story/2025-09-02/la-me-thunderstorms-danger>

⁹³ National Ocean and Atmospheric Administration. The Impact of Wildfires on Climate and Air Quality An emerging focus of the NOAA ESRL Chemical Sciences Division. <https://cs1.noaa.gov/factsheets/csdWildfiresFIREX.pdf>

⁹⁴ *Understanding cumulative impacts require consideration of the complex interplay between socio-demographic, environmental, and public health factors that impact EJ communities. These communities are both more likely to be overburdened with pollution and more likely to suffer worse impacts from a given amount of pollution due to the socio-economic and other conditions in which they live.* Morello-Frosch, R., Zuk, M., Jerrett, M., Shamasunder, B., & Kyle, A. D. (2011). Understanding the cumulative impacts of inequalities in environmental health: implications for policy. *Health affairs*, 30(5), 879-887.; Ana Isabel Baptista, Ph.D., Adrienne Perovich, MPA, and research assistants Maria Fernanda Pulido-Velosa, Enrique Valencia, Marisa Valdez, and Jennifer Ventrella. (August 2022). Understanding the Evolution of 'Cumulative Impacts' Definitions and Policies in the U.S.

from 400 trucks.⁹⁵ Staggering greenhouse gas levels from locomotives only accelerate the ongoing climate crisis. In addition, the particulate matter and ozone that these sources emit are known to lead to more emergency room visits and hospitalizations from heart attacks, aggravated asthma, decreased lung function, restricted airways, and even premature death.⁹⁶ The EPA must support longstanding community demands for transitioning to cleaner rail operations. Investing in and deploying technologies like zero-emission locomotives is critical to saving lives—and remedying historic injustices. The risks from diesel emissions at inland- and sea-ports comes from numerous sources of freight pollution, including rail, all of which contribute to frontline and fenceline communities being at greater risk from both the proximity to and the cumulative sources of pollution.

The Inland Empire (“IE”), located adjacent to Los Angeles County, is becoming overwhelmed by Southern California ports’ expanding goods movement system. What once was a residential and agricultural region with a lively rancho culture and lifestyle is quickly being swallowed up by trucks and trains transporting goods to and from the region’s growing warehouse, storage, and distribution facilities. In the past 50 years, the number of industrial warehouses in the IE has increased by more than 26 times (i.e., from 162 to 4,299 warehouses).⁹⁷ Environmental documents developed for warehouse expansion projects detail “significant and unavoidable environmental detriments, whether that means greenhouse gas emissions, increases in the urban heat island effect, habitat destruction, loss of farmland, increased traffic or worsening air quality.”⁹⁸ Currently, the IE moves over 40% of goods in the United States and has the largest concentration of warehouses on the West Coast, with over 1 billion square feet of warehousing.⁹⁹ The IE has become one of the largest logistics hubs in the country because of the cargo coming in through trucking and rail from the San Pedro Bay Ports complex. Cargo activity at the ports is expected to rise by 57% from 2021 to 2032.¹⁰⁰

A study conducted by researchers of the Berkeley Public Policy School published in 2021 estimated that if we have an emissions reduction through Zero Emission vehicles, an ideal transition scenario, we could avoid approximately 150,000 premature deaths and equate to nearly \$1.3 trillion in health and environmental savings through 2050 in California.¹⁰¹ The revoking of the Endangerment Finding will cause 5,172.4 PREMATURE DEATHS PER YEAR, which is 14 DEATHS EVERY DAY just in California.

⁹⁵ California Air Resources Board. (Apr. 27, 2023). Proposed In-Use Locomotive Regulation: 2nd Hearing 5 <https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2023/042723/23-4-1pres.pdf>.

⁹⁶ Editorial Staff, American Lung Association. (June 11, 2025). How Decades-Old Trains Are Harming Air Quality <https://www.lung.org/blog/trains-air-pollution#:~:text=The%20engines%20that%20haul%20goods,the%20climate%20change%20health%20crisis.>

⁹⁷ Amparo Munoz, Susan Phillips, & Mary Ann Ruiz. (January, 2023). A Region in Crisis: The Rationale for a Public Health State of Emergency in the Inland Empire. https://www.ccae.org/files/ugd/2a4f33_535d5a32a3734461b36664ae7756921d.pdf

⁹⁸ Susan A. Philips. (May 1, 2022). “Op-Ed: We mapped the warehouse takeover of the Inland Empire. The results are overwhelming,” Los Angeles Times, <https://www.latimes.com/opinion/story/2022-05-01/inland-empire-warehouse-growth-map-environment>.

⁹⁹ Marissa Brookes, Fernando Márquez Duarte & Ellen Reese. (accessed August 11, 2025) “Plug In IE: A Dialogue on Sustainable Logistics,” Inland Empire Labor and Community Center at University of California, Riverside, <https://ielcc.ucr.edu/research/plug-ie-dialogue-sustainable-logistics>.

¹⁰⁰ Caroline Petrow-Cohen, (November 15, 2024) “Ports of Los Angeles and Long Beach set new cargo records,” Los Angeles Times, <https://www.latimes.com/business/story/2024-11-15/ports-of-los-angeles-and-long-beach-set-new-records>.

¹⁰¹ Sara Baldwin, Amanda Myers, Michael O’Boyle, and Energy Innovation David Wooley. (April 2021). Accelerating Clean Electrified Transportation by 2035: Policy Priorities a 2035 2.0 Companion Report. https://energyinnovation.org/wp-content/uploads/2021/04/Energy-Innovation_2035-2.0-Accelerating-Clean-Transportation-Policy-Report.pdf

One of the most affected regions is the Inland Empire in Southern California. Currently, the Inland Empire (IE) moves over 40% of goods in the United States. 90% of Southern California's warehouse growth in the past decade occurred in Riverside and San Bernardino counties, which causes that over half a million trucks drive in and out of the IE every day with the majority being fueled by diesel. All of these trucks release polluting emissions to the air like PM 2.5 & 10, nitrogen oxides, and greenhouse gases. Medium and Heavy-Duty Trucks (MHDV) are responsible for most of the air pollution in the nation. They generate the following emissions, just to mention a few:

- *30% of climate-warming emissions*
- *52% of PM 2.5, fine particles responsible for causing lung illnesses.*
- *58% of smog-forming nitrogen oxides (NOx)*

For California, MHDV trucks are responsible for 35% of the state's total nitrogen oxides (NOx) emissions and over 70% of statewide NOx emissions from on-road mobile sources. Additionally, the State of the Air report of 2024 published by the American Lung Association (ALA) shows that the counties of San Bernardino and Riverside came in first and second place nationally for worst ozone pollution levels. On average, San Bernardino has 175 days in the year of unhealthy air ozone pollution, almost half of the year. San Bernardino and Riverside counties also came in at 10th & 12th place, respectively, in the worst annual particle pollution levels based on national ambient air quality standards. Additionally, the report also shows that over 170,000 individuals suffer from asthma in San Bernardino, and over 190,000 individuals in Riverside. The trend of having the worst air quality nationally has been going on for quite a few years; the State of the Air report of 2023 published by the ALA also showed that San Bernardino and Riverside came in first and second place nationally for worst ozone pollution levels, and had on average 177 days of the year with unhealthy air ozone pollution in San Bernardino, again almost half of the year. Both counties also came in 7th and 8th place in the nation, respectively, for worst annual particle pollution levels. More than 98% of Californians live in an area that has failed to meet national standards on at least one measure of air quality.

The polluting emissions that trucks release to the air have deadly health impacts in our communities:

- *Nitrogen oxides (NOX) can irritate people's eyes, nose, throat, and lungs, possibly causing people to cough and experience shortness of breath, tiredness, and nausea. An estimated 4,401 tons of NOX are released annually.*
- *Nitrogen dioxide (NO2) can cause Asthma, COPD, unconsciousness, cardiovascular diseases and even death. Long-term exposure can lead to infertility.*
- *Particulate matter 10 microns or less (PM10) is inhalable into the lungs and can cause cardiovascular effects such as cardiac arrhythmias and heart attacks, and respiratory effects such as asthma attacks and bronchitis.*
- *PM (Particulate Matter) 2.5 microns or less is associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. It is also associated with heart disease,*

stroke, influenza, and pneumonia. Researchers also found a similar association between exposure to PM pollution and an increased risk of death from lung cancer among never-smokers.

I myself suffer from constant nosebleeds due to pollution when the air quality is bad. My mom has asthma. My wife has skin reactions when the air quality is bad in the area, and I have known of several people in the IE who have lost their lives in the last few years due to pollution.

We need environmental regulations; it is a matter of life and death for our communities. It is the government's responsibility to prevent deaths, not to benefit industry that profits from polluting our communities and letting our people die.

- Fernando Márquez Duarte, Policy Researcher & Advocate¹⁰²

It is well-documented that warehouses, diesel-fueled railyards, and rampant truck traffic harm public health, community well-being, and culture. In 2023, Little Village Environmental Justice Organization deployed truck-counting cameras at 35 locations around the Chicago area for 24 hours, one time at each location.¹⁰³ This trucking data collection supports many years of community advocacy and community testimony: many truck-intensive facilities are in low-income areas and communities of color, which leads to more exposure of residents to additional environmental pollutants.¹⁰⁴ These neighborhoods are exposed to more of this pollution— an average of 28% more nitrogen dioxide (NO₂), for example— because industrial and truck-intensive facilities, rail yards, and highways are often located in them.¹⁰⁵ “Diesel trucks are only 7% of traffic on Illinois’ roads but account for 36% of greenhouse gases, 59% of particulate matter (PM 2.5), and 67% of smog-forming nitrogen oxides emitted by all on-road vehicles.”¹⁰⁶ In addition, “Diesel tailpipe pollution even contains over 40 known carcinogens that can lead to lung cancer.”¹⁰⁷ Diesel exhaust provokes fatal and non-fatal heart attacks, strokes, irregular heartbeats, and may cause premature death in people with pre-existing heart and lung diseases. Illinois ranks 5th among all 50 U.S. states with the highest death toll per capita from diesel engine PM 2.5 emissions.”¹⁰⁸

At the same time, the convergence of activities at ports comes with several negative environmental impacts to air, water, land, and the surrounding communities, many of which are already subject to multiple sources of pollution.

Climate

The EPA’s proposal to repeal the Endangerment Finding undermines strong, global consensus among scientists that carbon dioxide and other heat-trapping gases are causing intense and irreversible changes to

¹⁰² The italicized testimonials were submitted in writing to be included in these written comments in response to the U.S. Environmental Protection Agency’s Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards Docket No. EPA-HQ-OAR-2025-0194 (September 22, 2025)

¹⁰³ Paulina Vaca. Chicago Truck Portal Data portal, <https://chicagotruckcounts.cnt.org> (as of Sep. 5, 2025).

¹⁰⁴ Id.

¹⁰⁵ Id. at “Who is impacted?” drop down page.

¹⁰⁶ Id. at “Health impacts of dirty fuel” drop down page; See also Patricio Portillo, J.C. Kibbey. (Jul. 11, 2022). It’s Time for Clean Truck Rules in Illinois. NRDC Blog, <https://www.nrdc.org/bio/patricio-portillo/its-time-clean-truck-rules-illinois#:~:text=Trucks%20have%20an%20outsized%20impact,direct%20impact%20on%20public%20health>.

¹⁰⁷ Id.; See also California Air Resource Board. (as of Sep. 5, 2025). Summary: Diesel Particulate Matter Health Impacts. <https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts>

¹⁰⁸ Id.; See also Dirty-Dozen-Impact-of-Diesel-Engine-Pollution-in-Illinois.pdf (as of Sep. 5, 2025).

the earth's climate.¹⁰⁹ Scientific evidence and data reinforce that there is a clear connection between the lived experiences from frontline and fenceline communities and their exposure to multiple sources and types of fossil fuel pollution.¹¹⁰ The cumulative health burden of pollution exposure for frontline and fenceline communities extends beyond fossil fuels to toxics, chemicals etc. too.¹¹¹ Thousands of modeling and observational studies support the baseline observations of our community members, who experience record-setting temperature spikes, more unprecedented storms, destructive wildfires, and frequent flooding.¹¹² These events destroy property, disrupt food production systems, and impact healthcare, education, and other essential services. Warmer temperatures also increase pollen levels and ground-level ozone formation, while flooding and moisture increase the spread of vector-borne diseases and mold. Wildfires create massive surges of particulate pollution in addition to hazardous compounds,¹¹³ and plumes can be carried thousands of miles from their source.¹¹⁴

Climate change impacts are not felt equally among the population. In the United States, it is frontline and fenceline communities who disproportionately bear the brunt of the impacts of the climate crisis, like extreme weather, hotter and more humid days, and higher levels of ground-level ozone. As a result, it is these groups who are the most susceptible to the climate-related health and safety impacts of climate change.¹¹⁵ These health impacts include elevated rates of mortality; chronic cardiovascular, renal, and respiratory illnesses; infectious diseases; mental health disorders; childhood developmental challenges; preterm births; and heat-related conditions such as dizziness, nausea, and heat stroke, all driven by rising temperatures, hurricanes, floods, wildfires, and other climate-related events.¹¹⁶

¹⁰⁹ Intergovernmental Panel on Climate Change, 2023: Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, H. Lee and J. Romero (eds.)]. IPCC, Geneva, Switzerland, pp. 35-115, doi: 10.59327/IPCC/AR6-9789291691647

Available: https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_LongerReport.pdf

¹¹⁰ Van Horne YO, Alcala CS, Peltier RE, Quintana PJE, Seto E, Gonzales M, Johnston JE, Montoya LD, Quirós-Alcalá L, Beamer PI. An applied environmental justice framework for exposure science. *J Expo Sci Environ Epidemiol.* 2023 Jan;33(1):1-11. doi: 10.1038/s41370-022-00422-z. Epub 2022 Mar 8. PMID: 35260805; PMCID: PMC8902490.; Timothy Q. Donaghy, Noel Healy, Charles Y. Jiang, Colette Pichon Battle, Fossil fuel racism in the United States: How phasing out coal, oil, and gas can protect communities, *Energy Research & Social Science*, Volume 100, 2023, 103104, ISSN 2214-6296, <https://doi.org/10.1016/j.erss.2023.103104>.; Morello-Frosch, R., & Obasogie, O. K. (2023). The Climate Gap and the Color Line — Racial Health Inequities and Climate Change. *The New England Journal of Medicine*, 388(10), 943–949. doi: 10.1056/NEJMs2213250.

¹¹¹ Emily Baumgaertner, Jsaon Jao, Eleanor Lutz, Josephine Sedgwick, Rumsey Taylor, Noah Throop, Josh Williams. (June 9, 2023). Noise Could Take Years Off Your Life. Here's How. <https://www.nytimes.com/interactive/2023/06/09/health/noise-exposure-health-impacts.html>.; Grande, G. et al. (2020, July 1). Association Between Cardiovascular Disease and Long-term Exposure to Air Pollution with the Risk of Dementia. *JAMA Neurol.* 77 (7). <https://pubmed.ncbi.nlm.nih.gov/32227140/>; Environmental Justice Health Alliance for Chemical Policy Reform. Coming Clean, and Campaign for Healthier Solutions, Life at the Fenceline: Understanding Cumulative Health Hazards in Environmental Justice Communities (September 2018). <https://new.comingcleaninc.org/assets/media/documents/Life%20at%20the%20Fenceline%20-%20English%20-%20Public.pdf>; Rachel Morello-Frosch et al., Understanding the Cumulative Impacts of Inequalities in Environmental Health: Implications for Policy. *Health Affairs* 30. No. 5 (2011). p.879-998.

¹¹² National Academies of Sciences, Engineering, and Medicine. (2024). Compounding Disasters in Gulf Coast Communities 2020-2021: Impacts, Findings, and Lessons Learned. Washington, DC: The National Academies Press. <https://doi.org/10.17226/27170>.

¹¹³ National Academies of Sciences, Engineering, and Medicine. 2022. The Chemistry of Fires at the Wildland-Urban Interface. Washington, DC: The National Academies Press. <https://doi.org/10.17226/26460>.

¹¹⁴ Crimmins, A.R. (editor); Avery, C.W. (editor); Easterling, D.R.; Kunkel, K.E. (editor); Stewart, B.C. (editor); Maycock, T.K. (editor). (2023). U.S. Global Change Research Program. United States. U.S. Fifth National Climate Assessment. DOI <https://doi.org/10.7930/NCA5.2023>

¹¹⁵ Berberian AG, Gonzalez DJX, Cushing LJ. Racial Disparities in Climate Change-Related Health Effects in the United States. *Curr Environ Health Rep.* 2022 Sep 9(3):451-464. doi: 10.1007/s40572-022-00360-w. Epub 2022 May 28. PMID: 35633370; PMCID: PMC9363288.

¹¹⁶ Ibid

The U.S. Environmental Protection Agency's (EPA's) own climate vulnerability assessment found that: (1) Hispanic and Latino individuals are 43% more likely to live in areas with the highest projected labor losses due to extreme heat with 2°C of global warming, especially in weather-exposed jobs; (2) Native Americans are 48% more likely to live in areas where the highest percentage of land is projected to be lost to inundation due to sea level rise, posing serious risks to tribal lands, cultural heritage, and housing stability, and (3) 40% of Black individuals are more likely to live in the areas with the highest projected childhood asthma diagnoses.¹¹⁷ On top of disproportionate exposure to air pollution, freight-impacted communities suffer from several additional harms from the freight sector: the paved areas and large, low buildings dominating freight facilities contribute to urban heat island effects, stormwater issues, and other environmental impacts.

Climate-fueled disasters continue to hit frontline and fenceline communities, increasing in their frequency and severity. Demographic analysis shows that residents of “fenceline zones” are far more likely to be Black, Latino, and living in poverty than the U.S. as a whole.¹¹⁸ These communities are also often the first and hardest hit, while receiving the least amount of support and reinvestment after the events. Moreover, they are more likely to have inadequate infrastructure and insurance. These residents are also “more likely to live near industrial facilities and are therefore at a higher risk for chemical spills and toxic leaks resulting from toxic storms.”¹¹⁹ In total, low-income communities and communities of color “are found to be particularly more vulnerable to heatwaves, extreme weather events, environmental degradation, and subsequent labor market dislocations.”¹²⁰ The scientific evidence of human-caused climate change is unequivocal and has only grown more compelling since the 2009 Endangerment Finding was issued.

Intensifying extreme weather events, in particular, hit frontline and fenceline communities the hardest. Heat is the deadliest extreme weather event in the United States, killing more people each year than all the other forms of extreme weather events combined.^{121,122} In New York City, for example, the majority of residents in neighborhoods with the highest levels of heat vulnerability are concentrated in environmental justice areas.¹²³ In fact, 50% of the heat-related deaths are among Black/African American people,¹²⁴ even though they make up around 25% of the city's population.¹²⁵ This reality is faced by many

¹¹⁷ U.S. Environmental Protection Agency Headquarters. (2021, September). Climate Change and Social Vulnerability in The United States [Announcements and Schedules]. <https://www.epa.gov/cira/social-vulnerability-report>

¹¹⁸ <https://comingcleaninc.org/assets/media/images/Reports/Who's%20in%20Danger%20Report%20FINAL.pdf>

¹¹⁹ Aneesh Patnaik, Jiahn Son, Alice Feng, Crystal Ade. (August 15, 2020). Racial Disparities and Climate Change <https://psci.princeton.edu/tips/2020/8/15/racial-disparities-and-climate-change>

¹²⁰ Ibid.

¹²¹ Denise Chow (August 2, 2022). Heat kills more in U.S. each year than any other extreme weather event. NBC News, <https://www.nbcnews.com/health/health-news/heat-waves-deadliest-weather-event-united-states-rcna41129>.

¹²² Youri Benadjaoud and Bill Hutchinson. (July 28, 2025). As much of the US braces for extreme heat, statistics show 2,000 die from it annually.

ABC News, <https://abcnews.go.com/Health/us-braces-extreme-heat-statistics-show-2000-die/story?id=124136576>

¹²³ New York City Mayor's office of Sustainability. (2025). Environmental Justice in NYC: 2025 update.

https://climate.cityofnewyork.us/wp-content/uploads/2025/04/EJNYC_Report.pdf

¹²⁴ New York City Department of Health and Mental Hygiene. (August 2014) Heat-related Deaths in New York City, 2013. Epi Data Tables, No. 47, <https://www1.nyc.gov/assets/doh/downloads/pdf/epi/datatable47.pdf>

¹²⁵ The Furman Center for Real Estate and Urban Policy. The Changing Racial and Ethnic Makeup of New York City Neighborhoods. <https://furmancenter.org/research/publication/the-changing-racial-and-ethnic-makeup-of-nyc-neighborhoods;> U.S. Census Bureau. U.S. Census Bureau QuickFacts: New York city, New York. <https://www.censusdots.com/race/new-york-demographics>.

environmental justice communities across New York State¹²⁶ and the country¹²⁷ due to factors such as inadequate housing and lack of access to cooling and green spaces.

This year, in California, extreme heat amplified the severity of several wildfires, causing devastation to frontline and fenceline communities throughout Los Angeles County. Residents in Latino neighborhoods are already exposed to diesel particulate matter at levels twice as high as those in white neighborhoods, leading to higher rates of asthma and other health inequities worsened by wildfire smoke. They are also almost more likely to be employed in outdoor jobs where wildfires are likely to disrupt work and income.¹²⁸ The Eaton Fire destroyed over 9,000 structures, including ten churches, five schools, and many small businesses.^{129,130,131} In addition to exposure to toxic particle pollution from the wildfire, which can cause a number of harmful health effects like eye irritation, exacerbation of asthma and heart failure, the burning of older homes releases hazardous lead into the air and onto surrounding surfaces in the neighborhood, like Altadena. Lead absorption was notably higher among Black women during the fire's initial week.^{132,133} The Black Altadena community, already burdened by an affordability crisis, is confronting a growing set of climate-driven challenges that compound existing inequities.¹³⁴ These examples underscore the intersection of climate risk and systemic inequity, where historically frontline and fenceline communities face the greatest exposure to extreme weather events while having less access to resources to recover and return. Studies show that without strong policy interventions, these disasters driven by climate change will worsen inequities over time.¹³⁵

Global Impacts

The United States is one of the largest contributors to global warming pollution. Despite making up just 4% of the world's population, the United States produces 13% of all global CO₂ emissions— “And America is still number one, by far, in cumulative emissions over the past 150 years”.¹³⁶ The effects of

¹²⁶ New York State. (2024). Extreme Heat in New York State. Summary of Impacts and Vulnerabilities <https://dec.ny.gov/environmental-protection/climate-change/effects-impacts/extreme-heat>

¹²⁷ Shengjie Liu, Emily Smith-Greenaway, Racial and ethnic minorities disproportionately exposed to extreme daily temperature variation in the United States, *PNAS Nexus*, Volume 3, Issue 5, May 2024, pgae176, <https://doi.org/10.1093/pnasnexus/pgae176>; Benz, Susanne Amelie, and Jennifer Anne Burney. 2021. “Widespread Race and Class Disparities in Surface Urban Heat Extremes Across the United States.” *Earth's Future* 9 (7): e2021EF002016. <https://doi.org/10.1029/2021EF002016>

¹²⁸ Chhandara Pech, Silvia R. González, Albert Kochaphum. (January 10, 2025). Wildfires and Latino Communities: Health, Economic, and Preparedness Challenges. <https://latino.ucla.edu/research/wildfires-and-latino-communities-health-economic-and-preparedness-challenges/>

¹²⁹ CalFire (2025) Top 20 Most Destructive California Wildfires. <https://shorturl.at/BY90u>

¹³⁰ Rebecca Lindsey. (February 19, 2025). The weather and climate influences on the January 2025 fires around Los Angeles. National Oceanic and Atmospheric Administration, <https://shorturl.at/Vj8ko>

¹³¹ Carroll Loupeda, Jana Saadeh, & Lana Diep. (2025). “You can taste the fire”: Eaton and the Endangerment Finding. WE ACT for Environmental Justice. <https://storymaps.arcgis.com/stories/45b5162b8a514d69b0db52335c3ad111>

¹³² U.S. Environmental Protection Agency. (January 30, 2025). Health Effects Attributed to Wildfire Smoke. <https://www.epa.gov/wildfire-smoke-course/health-effects-attributed-wildfire-smoke>

¹³³ Elizabeth Moss, AfroLA. (April 23, 2025). Black women were at increased risk for lead absorption during the L.A. wildfires. Here's why. <https://shorturl.at/7sCZb>

¹³⁴ Paul Ong, Chhandara Pech, Lorrie Frasure, Samyu Comandur, Eric Lee, and Silvia R. González. (January 28, 2025). LA Wildfires: Impacts on Altadena's Black Community <https://bunchecenter.ucla.edu/wildfires-altadena-black-community/>

¹³⁵ Howell, J., & Elliott, J. R. (2018). As Disaster Costs Rise, So Does Inequality. *Socius*, 4. <https://doi.org/10.1177/2378023118816795> (Original work published 2018)

¹³⁶ Amanda MacMillan and Jeff Turrentine. (December 20, 2024). Global Warming 101. Natural Resource Defense Council, <https://www.nrdc.org/stories/global-warming-101#contribute>.

this contribution are felt across the globe, including in adjacent countries like Mexico, which pale in comparison to the U.S. in terms of their contributions to global CO2 emissions.¹³⁷ These countries are impacted not just by the effects of global warming pollution but also by the increased risk of climate disasters. They are deeply connected by the global freight trade, with rail and trucks actively moving cargo to and from the United States. As a leading contributor to carbon emissions, the United States has a particular responsibility to cut its emissions deeply and rapidly.¹³⁸ Instead, the EPA is proposing rescinding regulations that will lead to an immeasurable amount of pollution being added to the climate.

Desde hace años he vivido con problemas de la piel como rosácea y eczema, he tratado de aliviar mis síntomas y parecía que nada me funcionaba hasta que entendí que estas afectaciones eran resultado del efecto invernadero y la alta contaminación del aire que existe en Mexicali. Las partículas contaminantes combinadas con la mala calidad del aire han provocado inflamación y sensibilidad en mi piel, y en personas como yo con condiciones dermatológicas, estos brotes se vuelven más frecuentes y difíciles de controlar.

Me he dado cuenta de cómo la contaminación y el cambio climático no solo afecta lo respiratorio, provoca daños a la piel y altera nuestra salud, sino también reduce nuestra calidad de vida. Es preocupante ya que Mexicali es frontera con Estados Unidos, todo lo que se produce en el sur de California nos está afectando, por eso es importante exigir políticas que tomen en cuenta la salud de los que vivimos en zonas afectadas por esta contaminación.
- Lorenia Gutiérrez Moreto Cruz (Profesora de preescolar)¹³⁹

For years, I've lived with skin conditions like rosacea and eczema. I've tried to reduce my symptoms, but nothing seemed to work until I realized these conditions were a result of the greenhouse effect and the high air pollution in Mexicali. The polluting particles combined with poor air quality has caused inflammation and sensitivity in my skin, and for people like me with dermatological conditions, these outbreaks become more frequent and difficult to control.

I've realized how pollution and climate change not only affect our respiratory system, cause skin damage, and disrupt our health, but also reduce our quality of life. This is a worrying situation since Mexicali borders the United States; everything produced in Southern California is affecting us, and that's why it's important to demand policies for the health of those who live in areas affected by this pollution and to be taken into account.

- Lorenia Gutiérrez Moreto Cruz (Preschool Teacher) Translated to English by Ferando Márquez Duarte

Soy ginecóloga con 40 años de experiencia. Todos los gases de efecto invernadero que son provocados por usos de combustibles fósiles y que son emitidos a la atmósfera por camiones y

¹³⁷ Union of Concerned Scientists. (Jul 16, 2008 Updated Jul 12, 2023). Each Country's Share of CO2 Emissions. <https://www.ucs.org/resources/each-countrys-share-co2-emissions>

¹³⁸ Union of Concerned Scientists.(July 2021). A Transformative Climate Action Framework Putting People at the Center of Our Nation's Clean Energy Transition. <https://www.ucs.org/sites/default/files/2021-08/A-Transformative-Climate-Action-Framework.pdf>

¹³⁹ The italicized testimonials were submitted in writing, originally in Spanish and translated to English, to be included in these written comments in response to the U.S. Environmental Protection Agency's Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards Docket No. EPA-HQ-OAR-2025-0194 (September 22, 2025)

otras fuentes, causan enfermedades respiratorias como asma, EPOC, rinitis, cardiovasculares como arritmias cardiacas e hipertensión y cerebrales como Parkinson, Alzheimer y otras demencias, así como causan trastornos del neuro desarrollo en mujeres embarazadas. Hay investigaciones que muestran que la contaminación del aire afecta la placenta, provocando placentas de mala calidad que generan hipoxia en el feto durante el embarazo, esto aumenta el riesgo de preeclampsia durante el embarazo, lo que condiciona una falta de oxígeno crónico en el feto en el feto en el último trimestre del embarazo. Esto causa bajo peso al nacer, falta de neuro desarrollo adecuado, es decir, problemas de aprendizaje, incrementando el riesgo de déficit de atención autismo y enfermedades crónico degenerativas en la etapa adulta, como hipertensión, diabetes, cáncer, y en las mujeres poliquistosis ovárica e infertilidad.

Aquí en la frontera de Mexicali con el valle Imperial tenemos muchísimos camiones que llegan de Estados Unidos, además, el aire no reconoce fronteras y la contaminación nos llega a nosotros. Por esta contaminación tenemos 7 años menos de esperanza de vida en la región, y esto empeorará si no se regula la contaminación del aire. Yo empecé con rinitis, sinusitis frecuentes, hiposmia, y desde hace años tengo asma.

- Dra Edna Duarte Hernández (Ginecóloga)¹⁴⁰

I am a gynecologist with 40 years of experience. All greenhouse gases produced by the use of fossil fuels and emitted into the atmosphere by trucks and other sources cause respiratory diseases such as asthma, COPD, and rhinitis; cardiovascular diseases such as cardiac arrhythmias and hypertension; and cerebral diseases such as Parkinson's, Alzheimer's, and other dementias; as well as neurodevelopmental disorders in pregnant women. Research shows that air pollution affects the placenta, causing poor-quality placentas that generate hypoxia in the fetus during pregnancy. This increases the risk of preeclampsia during pregnancy, which leads to a chronic lack of oxygen in the fetus in the last trimester of pregnancy. This causes low birth weight, lack of adequate neurodevelopment, that is, learning disabilities, increasing the risk of attention deficit disorder (ADHD), autism, and chronic degenerative diseases in adulthood, such as hypertension, diabetes, cancer, and, in women, PCOS and infertility.

Here on the Mexicali border with the Imperial Valley, we have tons of trucks arriving from the United States. Furthermore, the air knows no borders, and the pollution reaches us. Because of this pollution, we have seven years less life expectancy in the region, and this will worsen if air pollution isn't regulated. I started with rhinitis, frequent sinusitis, hyposmia, and I've had asthma for years.

- Dr. Edna Duarte Hernández (OBGYN) Translated to English by Ferando Márquez Duarte

The testimonial from Dr. Jesús Fernando Ledezma explains why the residents quoted in the above two testimonials feel that GHGs, in addition to GHG co-pollutants, are playing a role in making them sick.

¹⁴⁰ The italicized testimonials were submitted in writing, originally in Spanish and translated to English, to be included in these written comments in response to the U.S. Environmental Protection Agency's Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards Docket No. EPA-HQ-OAR-2025-0194 (September 22, 2025)

*Como alergólogo comparto datos basados en investigaciones sobre los efectos en la salud pública de la contaminación ambiental y la necesidad de regulaciones ambientales. Los gases efecto invernadero provocan el calentamiento global. Las temperaturas más elevadas extienden la temporada de polen y aceleran el ciclo de vida de las plantas, lo que aumenta la producción de alérgenos. Un estudio publicado en la revista *Proceedings of the National Academy of Sciences (PNAS)* en 2021 demostró que las temporadas de polen se están volviendo más largas e intensas en Estados Unidos, con un incremento del 20% en la cantidad de polen entre 1990 y 2018. Esto significa que las personas con alergias y asma están expuestas a mayores concentraciones de alérgenos durante periodos más prolongados.*

Por otro lado, el calentamiento global intensifica la frecuencia, duración y severidad de los incendios forestales. Estos incendios liberan grandes cantidades de partículas finas (PM2.5) y otros contaminantes como el monóxido de carbono, óxidos de nitrógeno y compuestos orgánicos volátiles. Las partículas PM2.5, que tienen un diámetro de 2.5 micrómetros o menos, son especialmente peligrosas porque son lo suficientemente pequeñas como para ser inhaladas profundamente en los pulmones, e incluso pueden ingresar al torrente sanguíneo.

*La exposición a este cóctel de contaminantes provoca una respuesta inflamatoria en las vías respiratorias. Un artículo de 2020 en *The New England Journal of Medicine* analizó los efectos de la exposición al humo de incendios, concluyendo que aumenta significativamente las hospitalizaciones por exacerbaciones de asma, enfermedad pulmonar obstructiva crónica (EPOC) y otras afecciones respiratorias. La evidencia sugiere que el humo no solo empeora las condiciones preexistentes, sino que también puede ser un factor de riesgo para el desarrollo de enfermedades respiratorias en personas sanas.*

- Dr Jesús Fernando Ledezma (Alergólogo)¹⁴¹

*As an allergist, I share research-based data on the public health effects of environmental pollution and the need for environmental regulations. Greenhouse gases cause global warming. Higher temperatures extend the pollen season and accelerate plant life cycles, increasing allergen production. A study published in the journal *Proceedings of the National Academy of Sciences (PNAS)* in 2021 showed that pollen seasons are becoming longer and more intense in the United States, with a 20% increase in pollen counts between 1990 and 2018. This means that people with allergies and asthma are exposed to higher concentrations of allergens for longer periods of time.*

On the other hand, global warming intensifies the frequency, duration, and severity of wildfires. These fires release large amounts of fine particulate matter (PM2.5) and other pollutants such as carbon monoxide, nitrogen oxides, and volatile organic compounds. PM2.5 particles, which have a diameter of 2.5 micrometers or less, are especially dangerous because they are small enough to be inhaled deep into the lungs and can even enter the bloodstream.

¹⁴¹ The italicized testimonials were submitted in writing, originally in Spanish and translated to English, to be included in these written comments in response to the U.S. Environmental Protection Agency's Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards Docket No. EPA-HQ-OAR-2025-0194 (September 22, 2025)

Exposure to these pollutants triggers an inflammatory response in the airways. A 2020 article in The New England Journal of Medicine analyzed the effects of wildfire smoke exposure, concluding that it significantly increases hospitalizations for asthma exacerbations, chronic obstructive pulmonary disease (COPD), and other respiratory conditions. Evidence suggests that smoke not only worsens preexisting conditions but may also be a risk factor for the development of respiratory diseases in healthy people.

- Dr. Jesús Fernando Ledezma (Allergist) Translated to English by Fernando Márquez Duarte

La contaminación del aire ha generado en Mexicali el aumento de la temperatura, lo que lleva a eventos climáticos extremos mucho más frecuentes. Este cambio climático se ve influenciado por los efectos de gases de efecto invernadero, generados por las empresas privadas de transporte, de industria maquiladora y la agricultura de monocultivo de exportación a Estados Unidos que ocurre en el Valle de Mexicali. Estas empresas lucran a expensas de la salud de nuestras comunidades y de nuestras vidas.

Nuestra región es una de las más afectadas en el país, y dado que vivimos en la frontera de Mexicali con California, la decisión del gobierno estadounidense sobre las regulaciones ambientales solo incrementará aún más las problemáticas climáticas y de contaminación en la región.

- Raúl Ramos Sánchez (Profesor de preparatoria)¹⁴²

Air pollution has caused temperatures in Mexicali to rise, leading to more frequent extreme weather events. This climate change is influenced by the effects of greenhouse gases generated by private transportation companies, the maquiladora industry, and monoculture agriculture exported to the United States in the Mexicali Valley. These companies profit at the expense of the health of our communities and our lives.

Our region is one of the most affected in the country, and given that we live on the border between Mexicali and California, the U.S. government's decision on environmental regulations will only further exacerbate climate and pollution problems in the region.

- Raúl Ramos Sánchez (High School Teacher) Translated to English by Fernando Márquez Duarte

The potential progress that could have begun to address the global impacts of climate change has come to a major halt at the hands of this Administration, effectively ending the programs to electrify freight and further renewable energy projects like wind and solar, coupled with the current proposal to rescind the Endangerment Finding and GHG Vehicle Standards. The harms to people and the planet are indisputable and ever-growing in severity as emissions rise. Every major scientific society, as well as multiple authoritative reports, including the Fifth U.S. National Climate Assessment and the Sixth Assessment

¹⁴² The italicized testimonials were submitted in writing, originally in Spanish and translated to English, to be included in these written comments in response to the U.S. Environmental Protection Agency's Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards Docket No. EPA-HQ-OAR-2025-0194 (September 22, 2025)

Report of the Intergovernmental Panel on Climate Change, is clear about these facts.¹⁴³ The Endangerment Finding was built and reinforced by an extensive process that was based on years of scientific evidence, considered thousands of public comments, and was upheld by the federal courts. The EPA is now embracing climate denialism by relying on a deeply flawed "climate science" report commissioned by the Department of Energy (DOE) over just a few short months as the scientific basis for its proposal to revoke the Endangerment Finding and to repeal standards for motor vehicles and power plants.¹⁴⁴ This reversal blatantly ignores lived expertise, scientific research, and legal basis, and defies common sense.¹⁴⁵

The proposal does not consider the targeted and harmful effects that this “historic deregulation” effort will have on workers. (including the dangerous continuation and escalation of days when it is unhealthy to be outside and of chemical disasters caused or exacerbated by climate change-induced extreme weather).

“Today is the greatest day of deregulation our nation has seen. We are driving a dagger straight into the heart of the climate change religion to drive down cost of living for American families, unleash American energy, bring auto jobs back to the U.S. and more,” said EPA Administrator Lee Zeldin.¹⁴⁶ Yet trucking, in particular, has seen firsthand the disastrous results of deregulation for workers. The effects of deregulation stemming from the Federal Motor Carrier Act of 1980 has been a multiple-decade race to the bottom. The 2014 National Employment Law Project Report, *Big Rig: Poverty, Pollution, and the Misclassification of Truck Drivers at America’s Ports*, found that over 60% of port truck drivers are misclassified as independent contractors.¹⁴⁷ Contract truck drivers, especially those who are misclassified as contractors, earn low incomes and face high capital costs. Whereas regulatory compliance costs for large trucking firms represent a small percentage of their total revenue, contract truck drivers can face compliance expenses far above their yearly income. Drivers are on the job five days a week, from ten to twelve hours a day, earning an average income of \$28,000 per year while being responsible for all of the external costs to maintain their vehicle, and having no access to employee benefits like healthcare or paid time off. Furthermore, being paid by the load means that the drivers’ wait time throughout their time at the port—beginning with waiting in long queues just to enter the port, making it to the terminal, picking up a chassis, picking up the container, and leaving the port is basically all unpaid time.¹⁴⁸ The effects of this

¹⁴³ Rachel Cleetus. (August 22, 2025). I Testified at the EPA Hearing on the Repeal of the Endangerment Finding. <https://blog.ucs.org/rachel-cleetus/i-testified-at-the-epa-public-hearing-on-the-repeal-of-the-endangerment-finding-heres-what-i-said/>

¹⁴⁴ Ibid.

¹⁴⁵ David Doniger. (August 5, 2025). The EPA’s Endangerment Finding the Trump administration is rejecting the legal and scientific basis for cutting climate-changing pollution. <https://www.nrdc.org/resources/epas-endangerment-finding#:~:text=The%20endangerment%20finding%20reflects%20the%20overwhelming%20scientific%20evidence,comments%20and%20was%20upheld%20by%20the%20federal%20courts.>

¹⁴⁶ U.S. Environmental Protection Agency. (March 12, 2025). EPA Launches Biggest Deregulatory Action in U.S. History <https://www.epa.gov/newsreleases/epa-launches-biggest-deregulatory-action-us-history>

¹⁴⁷ Smith, Rebecca, Paul Alexander Marvy, and Jon Zerolnick. (2014). “The Big Rig Overhaul: Restoring Middle-Class Jobs at America’s Ports Through Labor Law Enforcement.” National Employment Law Project; Change to Win Strategic Organizing Center; and Los Angeles Alliance for a New Economy. <https://www.nelp.org/wp-content/uploads/2015/03/Big-Rig-Overhaul-Misclassification-Port-Truck-Drivers-Labor-Law-Enforcement.pdf>.

¹⁴⁸ Bensman, David. (2009). Port trucking down the low road: a sad story of deregulation. Rutgers University. DEMOS

deregulation have allowed the industry to profit at the expense of both workers and public health, and to use the misclassification of workers as a rationale for stopping life-saving regulatory actions.

Frontline workers are significantly impacted by the air pollution from industrial and transportation sectors covered under the Endangerment Finding and Vehicle Standards. The effects of the EPA’s proposal will increase air pollution, disproportionately affecting frontline workers both at work and at home in the low-income communities where they often live, which disproportionately host highways, chemical plants, ports, refineries, and railyards.

Another way that workers are disproportionately affected by this “historic deregulation” of the Endangerment Finding and GHG Vehicle Standards is exacerbated by the EPA’s reconsideration of the Safer Communities by Chemical Accident Prevention rule.¹⁴⁹ All of the proposed deregulations increase the risk of chemical disasters in the workplace due to the effects of extreme weather and climate change. A 2021 policy brief *Preventing Double Disasters*¹⁵⁰ and a 2022 Government Accountability Office (GAO) report, *Chemical Accident Prevention: EPA Should Ensure Regulated Facilities Consider Risks from Climate Change*¹⁵¹ both found that about one third of the over 10,000 facilities covered by EPA’s Risk Management Program (RMP) are located in areas that are vulnerable to increasingly severe extreme weather and that this multiplies the threat of a natural-hazard related technological (“natech”) disaster. Facilities covered by the RMP include some of the most dangerous facilities that exist due to their use, production, storage or other processing of a list of extremely hazardous chemicals above certain “threshold” quantities. Within 2025 alone, there have already been 131 chemical incidents in the United States tracked by the Coalition to Prevent Chemical Disasters.¹⁵² Chemical disasters and releases at facilities harm workers in and around those facilities—as well as emergency responders who respond to them—first and worst.¹⁵³

Ultimately, the exacerbation of the climate crisis and the increase in climate-related disasters will mean additional harms and risks for frontline workers. According to the EPA,

Workers are more vulnerable to the health impacts of climate change than the general population because:

- They work outdoors, in fields such as agriculture, construction, or transportation. This can make them more exposed to extremes in temperature and weather, poor air quality, and disease-carrying pests.¹⁵⁴

¹⁴⁹ U.S. Environmental Protection Agency. (April 18, 2025). Risk Management Program Safer Communities by Chemical Accident Prevention Final Rule. <https://www.epa.gov/rmp/risk-management-program-safer-communities-chemical-accident-prevention-final-rule>

¹⁵⁰ Darya Minovi, David Flores (July 7, 2021). Preventing “Double Disasters”

Center for Progressive Reform, <https://progressivereform.org/publications/preventing-double-disasters/>

¹⁵¹ U.S. Government Accountability Office. (Published: Feb 28, 2022. Publicly Released: Feb 28, 2022). Chemical Accident Prevention: EPA Should Ensure Regulated Facilities Consider Risks from Climate Change. GAO-22-104494, <https://www.gao.gov/products/gao-22-104494>

¹⁵² Coalition to Prevent Chemical Disasters. (2025). Chemical Incident Tracker. <https://preventchemicaldisasters.org/>

¹⁵³ United Steelworkers' Director of Regulatory and State Policy, Anna Fendley. (Nov 4, 2022) Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act; Safer Communities by Chemical Accident Prevention, public comment, EPA-HQ-OLEM-2022-0174-0216, <https://www.regulations.gov/comment/EPA-HQ-OLEM-2022-0174-0216>

¹⁵⁴ Gamble, J.L., et al. (2016). Ch. 9: Populations of concern. In: *The impacts of climate change on human health in the United States: A scientific assessment*. U.S. Global Change Research Program, Washington, DC, p. 258.

- They work in hot indoor environments that lack adequate air conditioning, such as in manufacturing plants, warehouses, and other facilities.¹⁵⁵
- They are emergency response workers, such as paramedics, firefighters, and police officers. These workers are more likely to be exposed to climate-related risks such as wildfire smoke or flooding from a heavy rainfall.^{156 157}

In addition to what EPA clearly lays out above regarding the impacts of climate change on workers, their work in chemical and other kinds of industrial facilities that are subject to chemical disasters like fires, explosions and chemical releases, which can be made more frequent and/or severe due to the impacts of climate change—especially when facilities are not required to account for potential climate impacts in their Risk Management Plans.¹⁵⁸ The proposed revocation of the Endangerment Finding and GHG Vehicle Standards will only exacerbate the harms and risks caused by what will be unregulated emissions, ultimately resulting in increased risks to the health and safety of workers and communities closest to pollution sources.

The proposal is based on flawed science.

In the face of overwhelming evidence, it is widely accepted by the global scientific and the global community at large that human-caused greenhouse gas emissions are causing the planet to warm, with severe health and safety impacts on people worldwide. It is therefore reckless for the EPA to even consider repealing a finding that legally authorizes the U.S. government to regulate greenhouse gas emissions. Doing so would amount to a betrayal of the government’s obligation to protect *human health and the environment*.¹⁵⁹ In 2023, the United States emitted nearly 16 gigatons of GHGs, accounting for 11% of emissions, and making it the second largest contributing country in the world.¹⁶⁰ When emissions are assessed based on each country’s fair share and historical contributions, the United States emerges as the leading contributor to global overshoot—responsible for 40% of all excess emissions worldwide.¹⁶¹ Therefore, our nation’s role as a top contributor to the breakdown of global climate pollution underscores its duty to reduce its emissions.

If the EPA proceeds with revoking the Endangerment Finding, the consequences will be severe. Greenhouse gases drive climate impacts, including dangerous heat waves, flooding, sea level rise, stronger storms, and widespread ecological disruption—impacts already documented by peer-reviewed

¹⁵⁵ Gamble, J.L., et al. (2016). Ch. 9: Populations of concern. In: *The impacts of climate change on human health in the United States: A scientific assessment*. U.S. Global Change Research Program, Washington, DC, p. 258.

¹⁵⁶ Gamble, J.L., et al. (2016). Ch. 9: Populations of concern. In: *The impacts of climate change on human health in the United States: A scientific assessment*. U.S. Global Change Research Program, Washington, DC, p. 258.

¹⁵⁷ The United States Environmental Protection Agency. (August 8, 2025). Climate Change and the Health of Workers <https://www.epa.gov/climateimpacts/climate-change-and-health-workers>

¹⁵⁸ Coming Clean. (September 29, 2021). Unprepared for Disaster: Chemical Hazards in the Wake of Hurricane Ida. https://comingcleaninc.org/assets/media/documents/Unprepared_for_Disaster_FINAL.pdf

¹⁵⁹ U.S. Environmental Protection Agency. (July 23, 2025). Our Mission and What We Do. <https://www.epa.gov/aboutepa/our-mission-and-what-we-do>

¹⁶⁰ European Commission. Joint Research Centre. & IEA. (2024). *GHG emissions of all world countries*. Publications Office. <https://data.europa.eu/doi/10.2760/4002897>

¹⁶¹ Hickel, J. (2020). Quantifying national responsibility for climate breakdown: An equality-based attribution approach for carbon dioxide emissions in excess of the planetary boundary. *The Lancet Planetary Health*, 4(9), e399–e404. [https://doi.org/10.1016/S2542-5196\(20\)30196-0](https://doi.org/10.1016/S2542-5196(20)30196-0)

research and government data. To justify this rollback, EPA cites the July 2025, Department of Energy's report "*A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate*" (CWG Report). This report is not a valid source. It has been widely criticized for misrepresenting climate science, cherry-picking data, and relying on authors with conflicts of interest.^{162,163} Its inclusion in this docket only makes it appear that this proposed rollback is a manufactured misinformation effort, not a legitimate regulatory process. EPA has a duty to reject disinformation and base its decisions on sound science and lived realities.

The scientific evidence when the Endangerment Finding was released was unequivocal in 2009 and has become even more dire and compelling over the years. More than 99% of peer-reviewed scientific literature and every major scientific body in the world agree that climate change is happening and is human-caused. peer-reviewed scientific literature affirms what frontline and fenceline communities have been saying for decades: there is no uncertainty about the urgency and gravity of the need to eliminate fossil fuel combustion and other major sources of greenhouse gas emissions.¹⁶⁴

The proposal is unlawful.

The EPA's proposed repeal of the Endangerment Finding and GHG Vehicle Standards is not legally sound and runs counter to the agency's obligations under the Clean Air Act, well-established Supreme Court precedent, and the Administrative Procedure Act.

In 2007, the Supreme Court ruled in *Massachusetts v. EPA* that carbon dioxide and other greenhouse gases are air pollutants under Section 202 of the Clean Air Act, and that the EPA has no authority to re-interpret the scope of Section 202. The Supreme Court reasoned that Section 202 grants the EPA authority to regulate "any air pollutant" for which it makes the necessary findings, (The EPA's suggestion that its authority is "narrow" is strained at best. Although the EPA argues that regulating GHGs raises a major question that has not been authorized by Congress, the *Massachusetts* decision already confirmed that GHGs are air pollutants and that Congress gave EPA the statutory authority to regulate GHG emissions from "new" motor vehicles.¹⁶⁵ We have little trouble concluding that it does.") In sum, the major questions doctrine provides no basis for repealing the Endangerment Finding. EPA's authority is clear, and *Massachusetts* prevents EPA's potential reliance on the major questions doctrine to repeal the Endangerment Finding.

¹⁶² Rachel Cleetus. (August 11, 2025). Why the EPA's Latest Move Could Worsen the Climate Crisis. <https://blog.ucs.org/rachel-cleetus/why-the-epas-latest-move-could-worsen-the-climate-crisis/>; Rachel Cleetus. (September 5, 2025) A Resounding Rejection of the US DOE's Sham "Climate Science" Report.

<https://blog.ucs.org/rachel-cleetus/a-resounding-rejection-of-the-us-does-sham-climate-science-report/>

¹⁶³ American Meteorological Society. (August 27, 2025). The Practice and Assessment of Science: Five Foundational Flaws in the Department of Energy's 2025 Climate Report <https://www.ametsoc.org/ams/about-ams/ams-statements/statements-of-the-ams-in-force/the-practice-and-assessment-of-science-five-foundational-flaws-in-the-department-of-energys-2025-climate-report/>

¹⁶⁴ Mark Lynas *et al* 2021 *Environ. Res. Lett.* 16 114005

¹⁶⁵ See *Massachusetts v. EPA*, 549 U.S. 497, 528 (2007) ("On the merits, the first question is whether § 202(a)(1) of the Clean Air Act authorizes EPA to regulate greenhouse gas emissions from new motor vehicles in the event that it forms a 'judgment' that such emissions contribute to climate change. We have little trouble concluding that it does.")

The EPA is required to rely on science when deciding whether to take regulatory action and cannot prioritize groundless policy preferences over public health. The EPA is not empowered to repeal the Endangerment Finding unless it can establish that GHGs do not endanger public health or welfare. The Clean Air Act and Administrative Procedure Act both prevent the EPA from completing a rule that is “arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law,” “in excess of statutory jurisdiction, authority, or limitations, or short of statutory right,” or “without observance of procedure required by law.”¹⁶⁶ Under this standard, “an agency rule would be arbitrary and capricious if the agency relies on factors which Congress has not intended it to consider, entirely failed to consider an important aspect of the problem, explained its decision that runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise.”¹⁶⁷ An agency must establish a “rational connection between the facts found and the choice made.”¹⁶⁸ The proposed reconsideration fails to meet the standards of the Clean Air Act and the Administrative Procedure Act, and if finalized, would therefore be arbitrary and capricious.

In addition, the EPA should not rely on the Department of Energy Climate Working Group (“CWG”) Report as a basis for repealing the finding. It seems this biased report was developed to counter proven, peer-reviewed scientific studies regarding the current climate crisis, and it fails to meet the baseline standards of the scientific method.¹⁶⁹ The CWG Report was not subject to peer review and does not comply with EPA, DOE, or OMB guidelines for relying on scientific information to ensure transparency and objectivity. Thus, the EPA leans on a report drafted by climate crisis skeptics—while dismissing more rigorous scientific assessments, like the National Climate Assessment and the U.N.’s Intergovernmental Panel on Climate Change (IPCC) reports. In addition, the Department of Energy (DOE) and EPA failed to comply with statutory requirements under the Federal Advisory Committee Act as they established and utilized the CWG, including by denying the public an opportunity to participate in that process or have transparent access to meetings and records of the CWG’s work.¹⁷⁰ We urge EPA not to rely on the DOE CWG Report.

The proposal does not consider the benefits of climate and environmental protection.

In addition to the massive public health benefits, climate regulations have clear and measurable benefits to jobs and the economy. A recent report from the American Lung Association (ALA) shows the tremendous benefits that could be achieved through 2050 by accelerating the deployment of electric trucks.¹⁷¹ ALA’s analysis shows that electric trucks could result in \$735 billion in public health benefits over the next 30 years and a more equitable future.¹⁷² It also found that in U.S. counties with major trucking routes, this transition would result in up to 66,800 avoided deaths, 1.75 million avoided asthma

¹⁶⁶ 42 U.S.C. § 7607(d)(9); 5 U.S.C. § 706(2)(A).

¹⁶⁷ *Motor Vehicle Mfrs. Ass’n v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983).

¹⁶⁸ *Id.* at 52.

¹⁶⁹ The Practice and Assessment of Science: Five Foundational Flaws in the Department of Energy’s 2025 Climate Report. <https://www.ametsoc.org/ams/about-ams/ams-statements/statements-of-the-ams-in-force/the-practice-and-assessment-of-science-five-foundational-flaws-in-the-department-of-energys-2025-climate-report/>

¹⁷⁰ Union of Concerned Scientists. EDF, UCS File Lawsuit Against Trump Administration Secret Convening of Climate Skeptics, Use of Their Hidden “Science” Report in Attempt to Overturn Endangerment Finding (Aug 12, 2025).

<https://www.ucs.org/about/news/edf-ucs-file-lawsuit-against-trump-administration-secret-convening-climate-skeptics-0>

¹⁷¹ American Lung Association. Delivering Clean Air: Health Benefits of Zero Emission Trucks and Electricity. (October 2022). <https://www.lung.org/clean-air/electric-vehicle-report>.

¹⁷² *Id.* p. 1.

attacks, and 8.5 million avoided lost workdays.¹⁷³ These benefits could be further amplified with an expansion of public transportation, which in turn could save urban households \$2,000 per year¹⁷⁴ and save 84,000 lives from traffic fatalities by 2050.¹⁷⁵

The EPA's proposal to rescind the Endangerment Finding and GHG Vehicle Standards risks hundreds of thousands of job losses, which would not occur under the current regulatory framework. While maintaining the status quo could prevent this loss of jobs, investment in renewable energy, solar and wind, as well as zero emission based electrification for the freight transportation system would result in additional hundreds of thousands of jobs gained, as well as building out a robust supply chain, and bringing manufacturing back to the United States.¹⁷⁶

In addition to reducing the catastrophic impacts of climate disruption, zero-emissions engines provide an immediate and direct benefit to community health because they reduce nitrogen oxides (NOx), volatile organic carbons (VOCs), particulate matter, and ozone. These "criteria pollutants" are conclusively linked to respiratory diseases, cardiovascular disease, poorer pregnancy outcomes, and mortality. The United States has been on track to slash vehicle emissions of GHG by 2032, through vehicle and fleet performance standards and the adoption of zero emissions electric engines.¹⁷⁷ A report from Securing America's Future Energy in March 2021 highlights the potential for more than 270,000 jobs "through investment in transportation manufacturing grants and tax incentives," and nearly 154,000 jobs through "incentives that make it cheaper to buy medium and heavy-duty electric vehicles, like trucks and buses."¹⁷⁸ The magnitude of transportation-related air pollution is large. For example, a recent analysis found that enacting planned Tier-3 internal combustion vehicles (ICV) standards or electrifying light-duty vehicles would reduce the toll of vehicle-related particulate mortality by 80-93 percent in major U.S. cities.¹⁷⁹ The study did not account for the reduction in vehicle-related NOx, VOCs, and ground-level ozone, which would pose additional benefits. Besides the benefits to reducing health costs, the technology behind ZEVs is rapidly maturing, resulting in economic gains for the country through the manufacturing of the ZEV technology and infrastructure build-out.

A report from the Environmental Defense Fund found that the EV supply chain "illustrates a robust and rapidly growing industry....[A]s of September 2021, 375 companies were identified across the MHD ZEV supply chain, with about 1000 locations across the country...[which] collectively employ more than

¹⁷³ Id.

¹⁷⁴ The High Cost of Transportation in the United States. (2024). Institute for Transportation and Development Policy. <https://itdp.org/2024/01/24/high-cost-transportation-united-states/>

¹⁷⁵ Reducing Costs, Commutes, and Climate Pollution: State Solutions for Better Transportation. (2025). Clean Rides Network. <https://static1.squarespace.com/static/66dcb2887978724e30d73dda/t/67dd87b54cac1f2d5d588943/1742571452358/Reducing+Costs%2C+Commutes%2C+and+Climate+Pollution+%5BFinal%5D.pdf>

¹⁷⁶ Daniel Wilkins. Endangerment finding rollback could lead to higher gas prices, job loss. (August 11, 2025).

<https://www.atlasevhub.com/weekly-digest/endangerment-finding-rollback-could-lead-to-higher-gas-prices-job-loss/#:~:text=Endangerment%20finding%20rollback%20could%20lead,job%20loss%20%E2%80%93%20Atlas%20EV%20Hub>

¹⁷⁷ Environmental Protection Agency, Carbon Pollution from Transportation, last updated April 25, 2025,

<https://www.epa.gov/transportation-air-pollution-and-climate-change/carbon-pollution-transportation>

¹⁷⁸ Keybridge Public Policy Economics. Securing America's Future Energy: The Commanding Heights of Global Transportation Quantifying the Employment Effects. (March 2021). <https://safe2020.wpenginpowered.com/wp-content/uploads/2021/03/The-Commanding-Heights-Of-Global-Transportation-Quantifying-The-Employment-Effects.pdf>

¹⁷⁹ Madalsa Singh, et al, Distributional impacts of fleet-wide change in light duty transportation: mortality risks of PM_{2.5} emissions from electric vehicles and Tier 3 conventional vehicles, Environmental Research Letters, 19 034034, DOI:10.1088/1748-9326/ad2a1f, <https://iopscience.iop.org/article/10.1088/1748-9326/ad2a1f/meta>

333,000 people and have announced over \$53.7 billion in new EV-related investments.”¹⁸⁰ The EPA’s Endangerment Finding is a key catalyst to support job growth and move innovative solutions like 100% zero emissions and renewable energy generation projects like wind and solar.¹⁸¹

Conclusion

Communities should not be forced to live in conditions where toxic pollution and climate disasters make it inevitable that their neighbors, friends, and family will face higher risks of asthma, cancer, and shortened lifespan simply because they live closer to the sources of pollution than those who live in areas further away from the pollution sources and climate impacts. The EPA was established over 50 years ago to protect communities and the environment, and it achieves this through regulatory actions, providing resources and technical assistance, and relying on scientific research. However, this EPA’s proposed repeal of the Endangerment Finding and Vehicle Standards is contrary to all of that, violating their own mission and mandate given to them by Congress in the Clean Air Act, and the public interest, as outlined above. In light of the realities, rolling back the EPA’s Endangerment Finding and vehicle emission standards would be a direct assault on environmental justice. Climate change amplifies health risks, compounding long-standing pollution disparities.¹⁸² Already, the health costs of air pollution and climate change exceed \$800 billion annually, and those costs are only projected to increase.¹⁸³

I am incredibly disturbed by the move to roll back the policy protecting the health of so many communities. I have suffered from pollution-induced asthma attacks since I was a kid, knowing this may escalate as a way of appeasing the current administration and giving businesses a "break" is infuriating. Beyond the personal, we know that Black and Brown communities will bear the brunt of this burden. We cannot shy away from naming the danger of this action. It is an overt perpetuation and escalation of environmental racism, violence, and is fundamentally anti-science. Leaving the decision of clean air regulations up to the state will create indiscriminate harm and wide burdens for communities in some of the poorest areas in the country. It will further politicize an issue that should not be political at all: the health of the most vulnerable. This will set back generations of hard work done by communities, scientists, and health providers, and I strongly disagree with the step to rescind the Endangerment Finding.

¹⁸⁰ Environmental Defense Fund. (October 2021). Charged-Up. Analysis of the Jobs, Investments, and Companies: in the Zero Emissions Medium and Heavy Duty Vehicle Supply-Chain Economy, National Assessment. https://www.edf.org/sites/default/files/documents/National%20MHD-ZEV-Supply-Chain-Analysis%2010.27.21_0.pdf; Vishnu Nair, Sawyer Stone, Gary Rogers, Sajit Pillai. (February 2, 2022). Technical Review of: Medium and Heavy-Duty Electrification Costs for MY 2027- 2030 Final Report. Roush Industries, Inc, Environmental Defense Fund, https://blogs.edf.org/climate411/files/2022/02/EDF-MDHD-Electrification-v1.6_20220209.pdf

¹⁸¹ AFL-CIO. (August 1, 2025). AFL-CIO Statement on Trump Administration Repeal of EPA Endangerment Finding. <https://aflcio.org/press/releases/afl-cio-statement-trump-administration-repeal-epa-endangerment-finding>

¹⁸² Crimmins, A., Balbus, J., Gamble, J.L., Beard, C.B., Bell, J.E., Dodgen, D., Eisen, R.J., Fann, N., Hawkins, M.D., Herring, S.C., Jantarasami, L., Mills, D.M., Saha, S., Sarofim, M.C., Trtanj, J., & Ziska, L. (Eds.). (2016). The impacts of climate change on human health in the United States: A scientific assessment. U.S. Global Change Research Project. https://health2016.globalchange.gov/low/ClimateHealth2016_FullReport_small.pdf

¹⁸³ Donald De Alwis & Dr. Vijay S. Limaye. (2021). *The Costs of Inaction: The Economic Burden of Fossil Fuels and Climate Change on Health in the United States*. Natural Resources Defense Council & Medical Society Consortium on Climate & Health. <https://www.nrdc.org/press-releases/report-health-costs-climate-change-and-fossil-fuel-pollution-tops-820-billion-year>

- Christina Marsh¹⁸⁴

Preserving and strengthening the Endangerment Finding and Greenhouse Gas Vehicle Standards is not just a regulatory necessity; it is a moral imperative to safeguard the health and future of the most impacted communities. We have fought to ensure that the EPA has the authority and uses its authority to do more, building in stringency that aims to eliminate the harms from GHG emissions, criteria pollutants, and toxic air pollutants that are significantly concentrated in low-income communities and communities of color. The EPA must change this current course of action and stop its proposal to revoke the Endangerment Finding and Greenhouse Gas Vehicle Standards, renew its commitments to environmental justice, reinstate essential funding, and commit to creating regulations that protect current and future generations.

Signed,
(in alphabetical order)

Able Differently
Alaska Community Action on Toxics
Alliance of Nurses for Healthy Environments
Backbone Campaign
Beyond Pesticides
Cahaba River Coalition
Center for Biological Diversity
Center for Community Action and Environmental Justice (CCA EJ)
Center for Earth Energy & Democracy (CEED)
Center for Environmental Health
Chesapeake Climate Action Network
Citizens for a Sustainable Future
Clean+Healthy
Clean Water Action
ClimateMama
Climate Justice Alliance
The Coming Clean Network
Comité de Justicia Ambiental de la Frontera
Communities for a Better Environment
Dana Simmons
Decolonial Praxis Collective
Deep South Center for Environmental Justice
Defend Our Health
Downwinders at Risk
Duwamish River Community Coalition

¹⁸⁴ The italicized testimonials were submitted in writing to be included in these written comments in response to the U.S. Environmental Protection Agency's Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards Docket No. EPA-HQ-OAR-2025-0194 (September 22, 2025)

Earthjustice
East Yard Communities for Environmental Justice
Environmental Justice Health Alliance
Environmental Justice Leadership Forum
Environmental Protection Information Center (EPIC)
Evergreen Action
Flint Rising
Food & Water Watch
For a Better Bayou
Friends of the Earth
Georgia Conservation Voters
GreenLatinos
Greenbank Associates
The Green Door Initiative
Habitable
The Harambee House / Citizens for Environmental Justice
Hip Hop Caucus
Institute for Local Self-Reliance
Ironbound Community Corporation
League of Conservation Voters
Learning Disabilities Association of America
Learning Disabilities Association of Alabama
Learning Disabilities Association of Arkansas
Learning Disabilities Association of California
Learning Disabilities Association of Georgia
Learning Disabilities Association of Illinois
Learning Disabilities Association of Iowa
Learning Disabilities Association of Maine
Learning Disabilities Association of Maryland
Learning Disabilities Association of Michigan
Learning Disabilities Association of Minnesota
Learning Disabilities Association of New Jersey
Learning Disabilities Association of New York
Learning Disabilities Association of North Carolina
Learning Disabilities Association of South Carolina
Learning Disabilities Association of Texas
Learning Disabilities Association of Utah
Learning Disabilities Association of Virginia
Learning Disabilities Association of Wisconsin
Long Beach Alliance for Children with Asthma
Los Jardines Institute
Mario T.
Memphis APRI
Milwaukee Riverkeeper

Mobile Environmental Justice Action Coalition
Moms for a Nontoxic New York (MNNY)
Moving Forward Network
Natural Resources Defense Council
New Jersey Environmental Justice Alliance
North American Climate, Conservation and Environment (NACCE)
NC Climate Justice Collective
New Jersey Environmental Justice Alliance
Occupy Bergen County (New Jersey)
Outdoor Promise
People in Defense of Earth and her Resources (PODER)
Pesticide Action and Agroecology Network (PAN)
Plug In America
Public Citizen
Regional Asthma Management & Prevention (RAMP)
Resource Renewal Institute
ReThink Energy Florida
Rise4EJ
Robina Suwol, Executive Director, California Safe Schools (Los Angeles, CA)
Rubbertown Emergency ACTION (REACT)
Sierra Club
Solutionary Rail
Sowing Justice
Stand.earth
The Sunrise Project
Tallahassee Food Network
Texas Environmental Justice Advocacy Services
Timothy Judson
Tishman Environment and Design Center, The New School
TWU
Union of Concerned Scientists
United Electrical Radio and Machine Workers of America (UE)
Unity In The Family Ministry
WE ACT for Environmental Justice
West End Revitalization Association - WERA