September 22, 2025

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EPA Docket Center
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Southern Alliance for Clean Energy Comments on Proposed Rescission of the Endangerment Finding

To whom it may concern,

Thank you for the opportunity to comment on the Environmental Protection Agency's proposal to rescind the Endangerment Finding.

The Southern Alliance for Clean Energy (SACE) is a nonprofit organization that has promoted responsible and equitable energy choices to ensure clean, safe, and healthy communities throughout the Southeast United States for the past 40 years.

We strongly oppose both the Environmental Protection Agency's (EPA) proposal to rescind greenhouse gas (GHG) emissions standards for vehicles and the proposal to rescind the Endangerment Finding. In this letter, we will focus our comments on the Endangerment Finding since it is fundamental to the vehicle GHG emissions standards and other federal regulations of GHGs under the Clean Air Act.

The proposal offers many problematic assertions, mischaracterizing the severity of impacts on Americans' health and welfare from climate change, the scale and role of American additions to the global GHG problem, and the benefits and costs of limiting GHG emissions from new vehicles. An area we would particularly like to comment on, though, is some of the developments that have occurred since the Endangerment Finding was issued in 2009.

In its proposal, the EPA attempts to justify the reconsideration of the Endangerment Finding by stating that since the finding's publication in 2009, there have been developments that bear on how federal agencies should interpret the statutory provisions they administer. However, while the EPA signals that those developments should invalidate the Endangerment Finding, a much more reasonable

take-away from the developments of the last 16 years is that the EPA should double down on bringing the benefits of limiting GHG emissions to Americans, not shirk its regulatory responsibilities.

Our Understanding and Observations of the Impacts and Risks of Climate Change Have Increased

Atmospheric carbon dioxide has spiked to levels far beyond anything in the history of human civilization. In 2024, atmospheric carbon dioxide averaged more than 424 parts per million (ppm), up from 387 ppm in 2009, and well over the high point of 300 ppm over the last 800,000 years.[1]

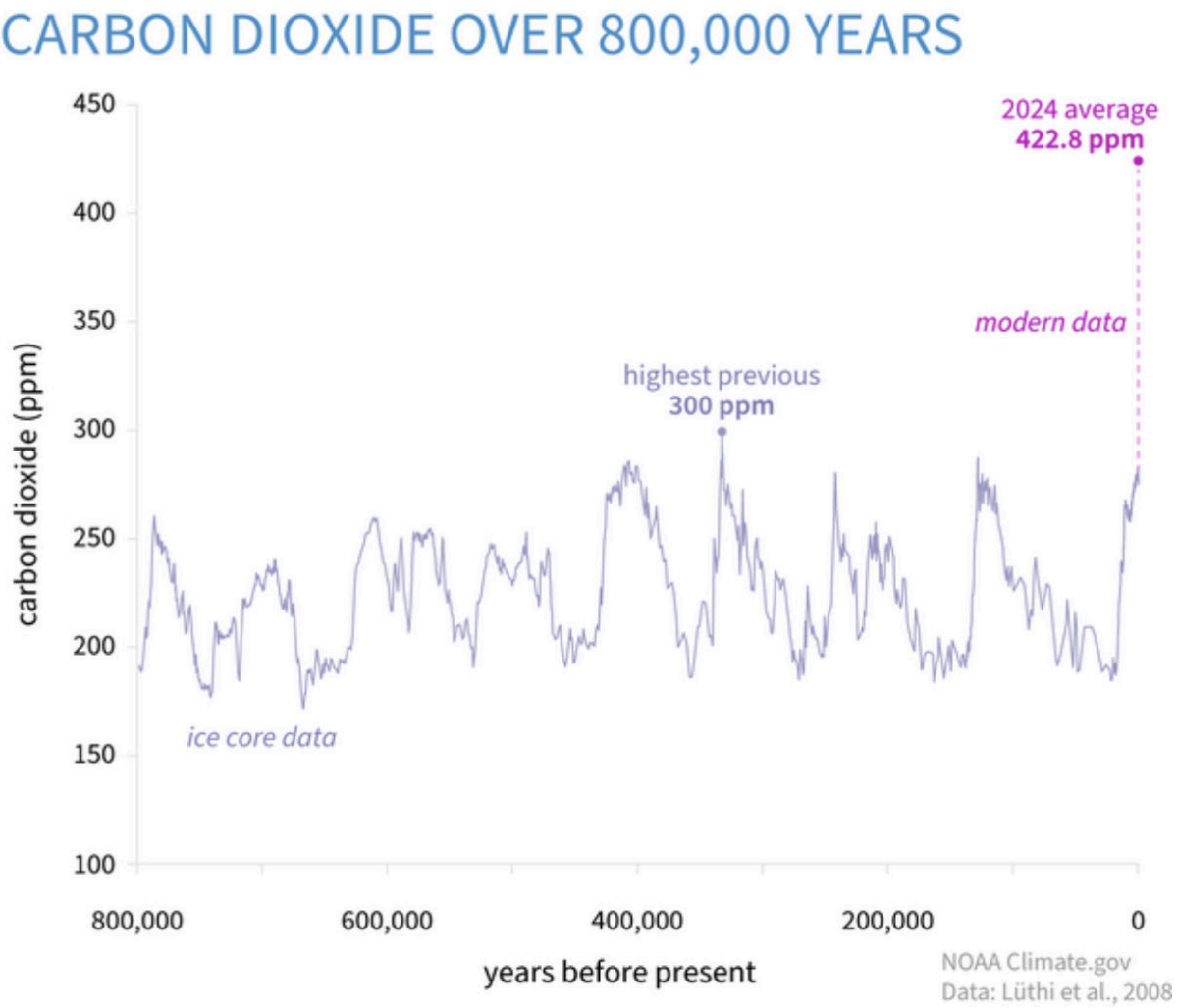

Figure 1: Atmospheric carbon dioxide has shot through the roof in modern history, to levels well above any other time in the history of human civilization. Credit: NOAA Climate.gov based on data from Lüthi, et al., 2008, via NOAA NCEI Paleoclimatology Program.[2]

[1] Dr. Xin Lan, NOAA/GML (gml.noaa.gov/ccgg/trends/) and Dr. Ralph Keeling, Scripps Institution of Oceanography (scrippsco2.ucsd.edu/).

[2] NOAA Climate.gov (2025). https://www.climate.gov/media/16929

Notably, considering the focus of the EPA's current proposal, **the transportation sector has become the United States' largest source of GHG emissions**, having overtaken the electric power sector which was the top source in 2009.[3] While the EPA asserts in this proposal that the U.S. transportation sector has negligible effects on global GHG pollution, it is in fact the largest source of GHG emissions from the second-to-highest emitting country on Earth, second only to China. Just the transportation sector emissions of the United States, totaling approximately 1,801 million metric tons of carbon dioxide equivalent (MMT CO2e),[4] are greater than the emissions of the entire economies of more than half the world's countries combined.[5]

Our planet's surface temperatures have soared in recent years, with the 10 hottest years on record all occurring in the last decade, topped off by 2024 being the single hottest year on record by a large margin. In other words, every single one of these years was hotter than when the Endangerment Finding was issued in 2009.

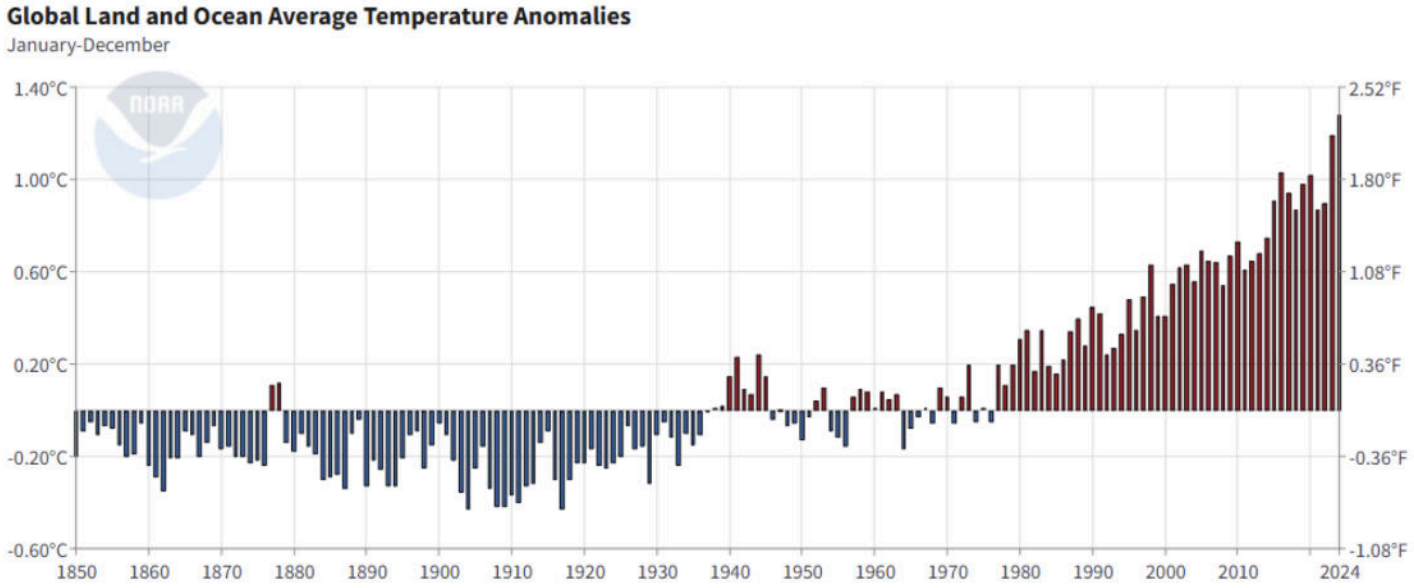

Figure 2: Earth's temperature is increasing at alarming rates. Credit: NOAA National Centers for Environmental Information. [6]

[3] U.S. Environmental Protection Agency (2024). "Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2022," Table 2-10. https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2022
[4] Ibid.
[5] World Resources Institute (2025). Climate Watch Historical GHG Emissions. https://www.climatewatchdata.org/ghg-emissions
[6] NOAA National Centers for Environmental Information (January 2025). Monthly Global Climate Report for Annual 2024. https://www.ncei.noaa.gov/access/monitoring/monthly-report/global/202413

Extreme weather and climate disasters have grown more severe. The number of billion-dollar weather and climate disasters — like we have experienced in the Southeast U.S. with Hurricanes Helene, Irma, and Milton — has skyrocketed, with the last 10 years accounting for nearly half of the costs of such disasters over the entire 44-year period that records have been kept.[7]

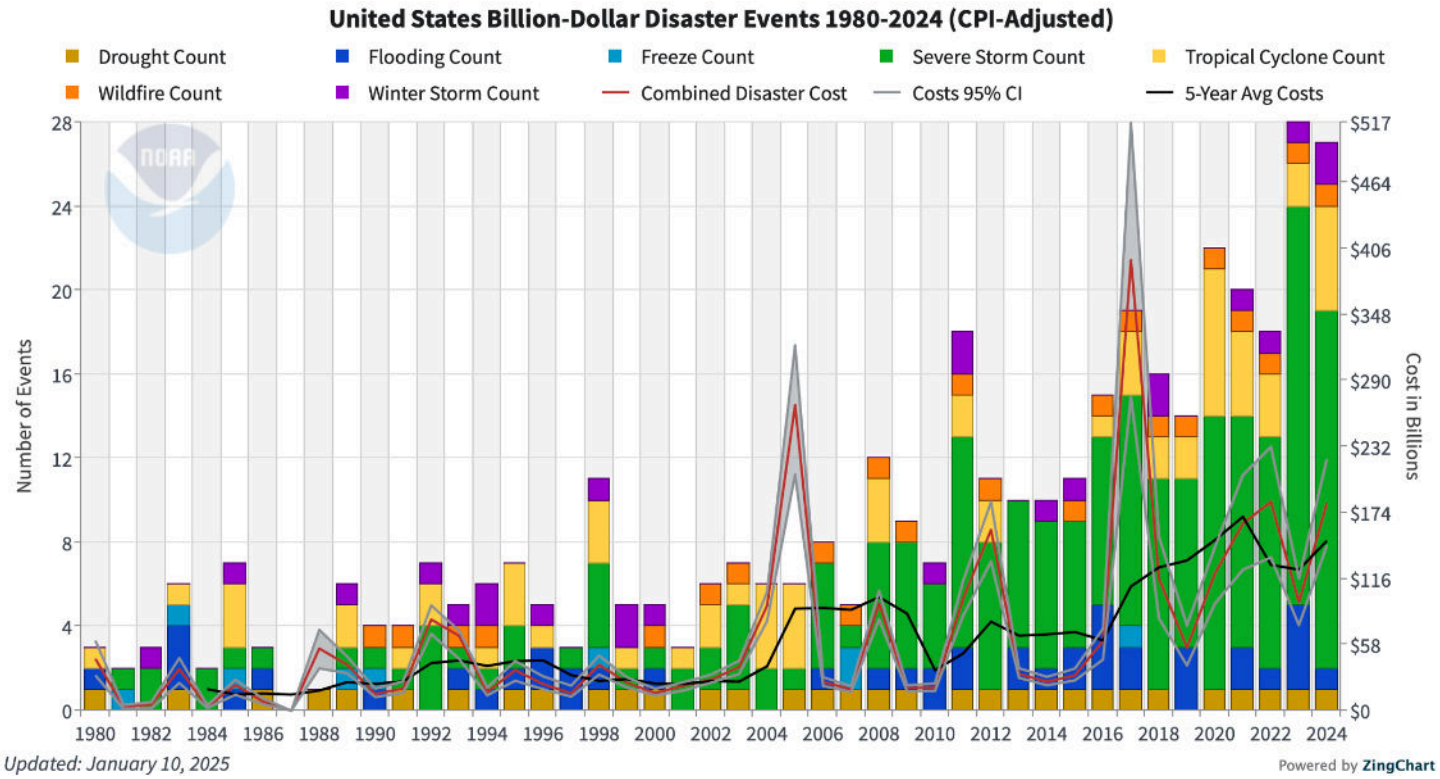

Figure 3: Increase in weather and climate disasters that cause more than $1 billion in damage. Credit: NOAA National Centers for Environmental Information.

Scientific certainty about the negative impacts of climate warming on Americans' health and welfare is growing. While the EPA is attempting in this proposal to sow confusion about the harm to public health and wellbeing by GHG-driven climate warming, the vast majority of experts are clear about this. For example, the National Academies of Sciences, Engineering, and Medicine research report published this month states *"EPA's 2009 finding that the human-caused emissions of greenhouse gases threaten human health and welfare was accurate, has stood the test of time, and is now reinforced by even stronger evidence. Today, many of EPA's conclusions are further supported by longer observational records and multiple new lines of evidence. Moreover, research has uncovered additional risks that were not apparent in 2009."*[8]

[7] NOAA National Centers for Environmental Information (2025). U.S. Billion-Dollar Weather and Climate Disasters. https://www.ncei.noaa.gov/access/billions/

[8] National Academies of Sciences, Engineering, and Medicine (2025). Effects of Human-Caused Greenhouse Gas Emissions on U.S. Climate, Health, and Welfare. https://doi.org/10.17226/29239.

The EPA is basing its proposal to rescind the Endangerment Finding partly on the perspective provided by the U.S. Department of Energy (DOE) Climate Working Group (CWG) 2025 Draft Report, which downplays the severity of impacts and urgency of climate warming. This report was produced primarily by *five* individuals behind closed doors with no external review – a process in stark contrast to collaboration among *hundreds* of individuals that have contributed to the vast scientific body of knowledge produced by the Intergovernmental Panel on Climate Change (IPCC); U.S. Global Change Research Program; and National Academies of the Sciences, Engineering, and Medicine, which report large, negative impacts of climate change. Eighty-five scientists reviewed the DOE CWG Draft Report that the EPA is relying on in part for its proposal to rescind the Endangerment Finding, and found that its key assertions "*are either misleading or fundamentally incorrect,*" that "*The authors reached these flawed conclusions through selective filtering of evidence ('cherry picking'), overemphasis of uncertainties, misquoting peer-reviewed research, and a general dismissal of the vast majority of decades of peer-reviewed research,*" and that "*the DOE CWG Report is not a sound source of information.*" [9]

Greenhouse Gas Mitigation Technologies Have Become Vastly More Economical, Accessible, and Capable

On the other hand, since 2009, the technology and economics of GHG mitigation has had a revolution. Setting EPA policy to disregard the incredible technological advances since 2009, which have made the cleanest forms of energy also the least expensive, is only to the detriment of the American public.

While in 2009, **solar** was an extraordinarily expensive way to generate electricity, it has since declined in cost by 84%, **becoming the least expensive source of new power generation** on average.[10]

New **wind energy generation** in 2009 cost more than fossil gas, and even more than building new coal. Wind power too has declined in price by 55%, and **is essentially tied with solar for the least expensive new form of electricity generation** on average.[11]

Solar and wind energy are now so efficient and affordable that not only are they less expensive than building new comparable thermal generation resources, but the all-in construction and operations

[9] A.E. Dessler and R.E. Kopp et al. (2025). "Climate Experts' Review of the DOE Climate Working Group Report." https://sites.google.com/tamu.edu/doeresponse/home
[10] Lazard (June 2025). Levelized Cost of Energy + 2025. https://www.lazard.com/research-insights/levelized-cost-of-energyplus-lcoeplus/
[11] Ibid.

costs of new renewable energy facilities is often less expensive than just the going-forward fuel costs of existing gas power facilities.

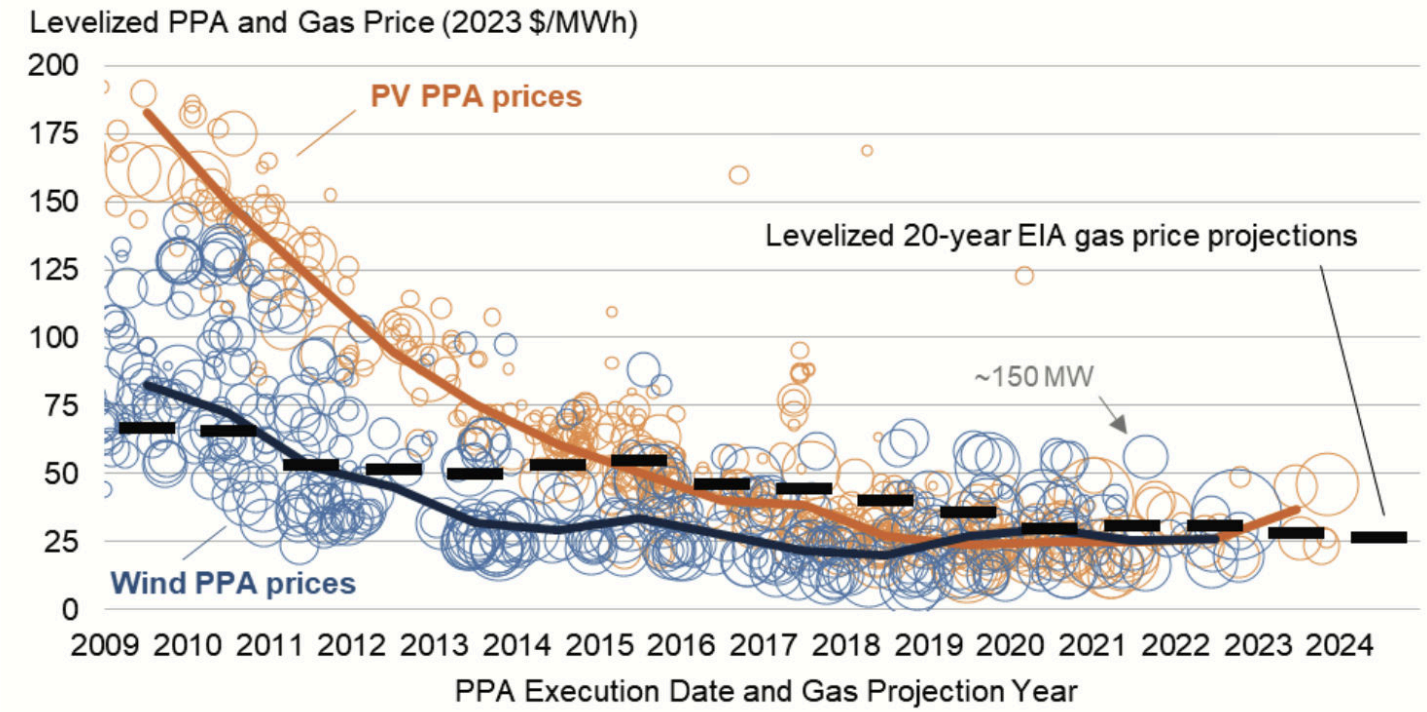

Figure 4: For most of the last decade, the power purchase agreement (PPA) prices of solar photovoltaic (PV) and wind energy facilities have been cheaper than just projected going-forward gas fuel prices. Credit: Lawrence Berkeley National Laboratory.[12]

Non-emitting renewable energy has also proven vastly more capable and reliable than the EPA understood in 2009. **Quite a number of states now run on high penetrations of renewable energy** that would have been considered infeasible back then. Vermont generated nearly 100% of its electricity from renewable sources in 2023: South Dakota generated 81% of its total in-state electricity from renewable sources in 2024; Iowa generated about three-fifths of the state's total electricity from renewable resources in 2023; New Mexico generated more than half of its power from renewable energy in 2024; and Nevada generated 43% of its electricity from renewable energy sources in 2024, etc.[13]

[12] Lawrence Berkeley National Laboratory (2024). Land-Based Wind Market Report 2024 Edition. https://www.energy.gov/eere/wind/land-based-wind-market-report

[13] U.S. Energy Information Administration (2025). State Energy Profiles. https://www.eia.gov/state/data.php

Energy storage technology has made remarkable progress in recent years, and it is now a mainstream solution to store solar and wind energy for dispatching later, helping meet peak power load demand events, and providing grid stabilizing ancillary services.

The automotive market has transformed in recent years as well, with **zero-emission electric vehicles growing from a niche product in 2009 to a mass market**, making up nearly 9% of light duty vehicles sold in the third quarter of 2024.

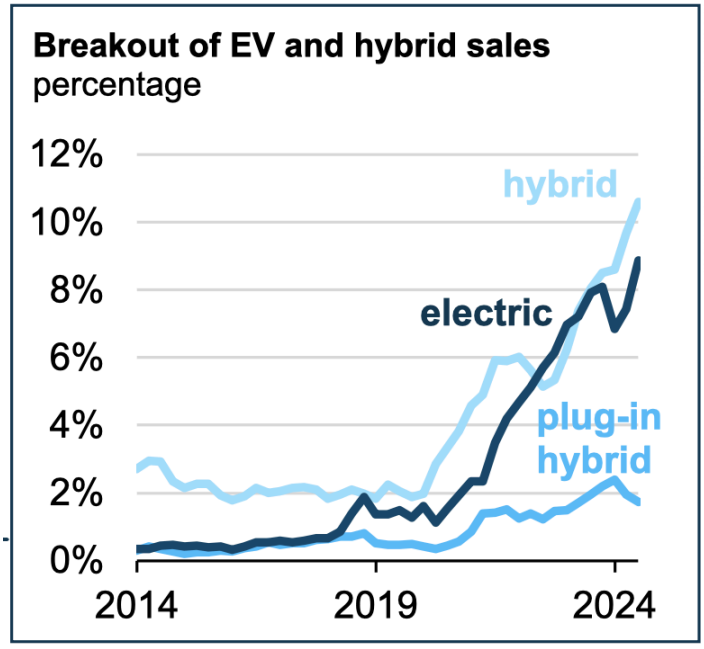

Figure 5: Sales of fully electric passenger vehicles grew from less than 1% of sales in 2014 to nearly one in ten in the third quarter of 2024. Credit: U.S. Energy Information Administration.[14]

EPA Policy Needs To Harness Modern GHG Mitigation Technology, Not Smother It

The current economics, scale, and capabilities of renewable energy, battery energy storage, and zero-emission vehicles were still basically a dream when the Endangerment Finding was published in 2009. We're now living in the beginning of a dream-come-true scenario, in which we can simultaneously reduce harmful GHG pollution and improve Americans' economic standing by utilizing the dramatic advances in clean energy technology in earnest.

[14] U.S. Energy Information Administration (December 4, 2024). "U.S. share of electric and hybrid vehicle sales reached a record in the third quarter." https://www.eia.gov/todayinenergy/detail.php?id=63904

But disappointingly, the current EPA proposal puts up more roadblocks to clean energy adoption, rather than helping Americans reap the benefits of clean energy.

EPA's sole job is to protect the people and places we love. In this proposal, the EPA states that it is attempting to "realign Agency resources to prioritize core statutory responsibilities," yet it is difficult to see how this move could possibly fulfill that intention. This proposal in fact is picking a fight that is anything but stewarding taxpayers' money or stewarding our shared environment.

Put simply, the agency going out of its way to remove the legal basis for limiting pollution that so clearly harms the American public, while claiming that this will help the EPA fulfill its environmental protection duties, defies logic and common sense.

Climate change is causing staggering harm to people and the environment, and the harm is only growing. The federal government absolutely has a responsibility to do what it can to help us protect ourselves from these harms, and EPA limits on climate pollution under the Clean Air Act are the most effective tool that the executive branch has at its disposal to do so.

Americans all over the country are paying the price in the form of intensifying flooding, wildfires, hurricanes, and extreme heat; and we are seeing with our own eyes tragedy after tragedy playing out. Yet with this proposal, Administrator Zeldin and the political decision makers at the EPA recklessly attempt to gaslight us into rejecting the reality of the climate crisis and undermine our ability to protect ourselves from its worst impacts.

Unfortunately we must reiterate in this public comment period our closing from another recent comment letter to the EPA. It appears that this proposal is absurd except when seen in light of the Trump administration political appointees' agenda to give free reign to corporate polluters to profit while harming people's health and the environment with impunity by sabotaging the EPA and its willingness and abilities to carry out its sole mission: to protect people and the environment.

We urge you to stop this reckless proposal.

Sincerely,

Chris Carnevale
Climate Advocacy Director
Southern Alliance for Clean Energy