

September 16, 2025

Administrator Zeldin,

We strenuously object to your recently proposed reconsideration of the Environmental Protection Agency's (EPA's) bedrock 2009 Endangerment Finding, which established the harms caused by heat-trapping emissions, and the Cause or Contribute Finding, which links these harms to the sources of pollution contributing to emissions.^{1,2} As climate scientists, public health experts, and economists, we can attest to the indisputable scientific evidence of human-caused climate change, its harmful impacts on people's health and well-being, and the devastating costs it is imposing on communities across the nation and around the world. This explicit attempt to undermine or weaken these Findings, as well as the critical regulations linked to them, is contrary to science and the public interest.

The EPA's authority and obligation to regulate heat-trapping emissions is firmly established in law and science, following from the 2007 Supreme Court *Mass v. EPA* decision, which determined that heat-trapping emissions are pollutants under the Clean Air Act and the EPA's subsequent Endangerment Finding and Cause or Contribute Findings for Greenhouse Gases.^{3,4} Efforts now to evade that responsibility will contribute to worsening and costly climate impacts and consequent harms to people's lives and livelihoods.

We also strongly oppose the EPA's reckless dismissal of established climate science as part of its proposal to repeal the Endangerment Finding, including the agency's heavy reliance on an unscientific study commissioned by the Department of Energy.⁵ This report is rife with inaccuracies, deliberately cherry-picks and mischaracterizes data, and has not undergone a rigorous scientific review process.⁶

The scientific evidence on human-caused climate change and its consequences was unequivocal in 2009 and, since that time, has become even more dire and compelling.^{7,8} Several recent authoritative syntheses of the latest science underscore this, including the US Fifth National Climate Assessment (NCA5),⁹ the

¹ <https://www.epa.gov/regulations-emissions-vehicles-and-engines/proposed-rule-reconsideration-2009-endangerment-finding>

² Environmental Protection Agency, Endangerment and cause or contribute findings for greenhouse gases under section 202(a) of the Clean Air Act. *Fed. Regist.* **74**, 66495–66546 (2009). These original findings were made in the context of motor vehicles and have subsequently been extended to other sources of heat-trapping emissions.

³ <https://supreme.justia.com/cases/federal/us/549/497/>

⁴ Environmental Protection Agency, Endangerment and cause or contribute findings for greenhouse gases under section 202(a) of the Clean Air Act. *Fed. Regist.* **74**, 66495–66546 (2009). <https://www.epa.gov/climate-change/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a>

⁵ Climate Working Group. 2025. A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate. Washington DC: Department of Energy, July 23, 2025. https://www.energy.gov/sites/default/files/2025-07/DOE_Critical_Review_of_Impacts_of_GHG_Emissions_on_the_US_Climate_July_2025.pdf

⁶ See <https://sites.google.com/tamu.edu/doeresponse/home> and <https://blog.ucs.org/rachel-cleetus/a-resounding-rejection-of-the-us-does-sham-climate-science-report/>

⁷ Philip B. Duffy *et al.* Strengthened scientific support for the Endangerment Finding for atmospheric greenhouse gases. *Science* **363**, eaat5982(2019). DOI:[10.1126/science.aat5982](https://doi.org/10.1126/science.aat5982)

⁸ Copernicus, 2025. Climate Change Service. Climate Indicators. <https://climate.copernicus.eu/climate-indicators>

⁹ USGCRP, 2023: *Fifth National Climate Assessment*. Crimmins, A.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, B.C. Stewart, and T.K. Maycock, Eds. U.S. Global Change Research Program, Washington, DC, USA. <https://doi.org/10.7930/NCA5.2023>

Intergovernmental Panel on Climate Change Sixth Assessment Report (IPCC AR6),¹⁰ and the 2024 Lancet Countdown Report on Climate and Health.¹¹ These assessments are backed by thousands of independent, peer-reviewed scientific studies conducted by scientists in the United States and across the world.

EPA's January 2025 scientific integrity policy calls for the use of the best available science to inform the agency's work. That must be the standard for the Endangerment Finding.¹² Based on the best available science, we know that:

Climate change poses severe harms to human health and well-being. These harms include higher rates of heat-related morbidity and mortality; increased transmission and geographic spread of certain infectious diseases; increases in poor air quality days;¹³ increased risks to pregnant people and their babies; higher rates of heart and lung diseases; and worsening mental health.^{14,15,16} Climate-fueled extreme weather events can also affect food and water safety and security and contribute to forced displacement of people.¹⁷ Compounding harms can arise when communities are hit hard or repeatedly by such events or face multiple climate hazards. Populations that are more vulnerable due to health status or socioeconomic factors, or that are marginalized due to systemic factors, often face disproportionate health burdens from extreme events and climate change.

Climate change is clearly increasing the likelihood of extreme events. The field of climate attribution science has advanced significantly in the last ten years, with a large peer-reviewed literature that firmly demonstrates and quantifies the climate contribution to specific extreme weather events, including heatwaves, floods, wildfires, and rapidly intensifying storms and tropical cyclones.^{18,19,20,21,22} There is also a growing literature establishing attribution of extreme events and other climate impacts, such as ocean

¹⁰ IPCC, 2023: *Climate Change 2023: Synthesis Report*. Contribution of Working Groups I, II and III to the 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](https://doi.org/10.59327/IPCC/AR6-9789291691647).

¹¹ The 2024 report of the *Lancet* Countdown on health and climate change: facing record-breaking threats from delayed action. Romanello, Marina et al. *The Lancet*, Volume 404, Issue 10465, 1847 – 1896.

¹² EPA. January 2025. Scientific Integrity Policy. <https://www.epa.gov/system/files/documents/2025-01/us-epa-scientific-integrity-policy.pdf>. The Trump EPA has since reversed the policy to an earlier 2012 version which fails to robustly protect scientific integrity at the agency.

¹³ Climate change is expected to worsen ground-level ozone, increase exposure to pollen, and contribute to worsening wildfire smoke.

¹⁴ *Lancet* 2024.

¹⁵ USGCRP 2023.

¹⁶ Clayton, S., Manning, C. M., Speiser, M., & Hill, A. N. 2021. *Mental Health and Our Changing Climate: Impacts, Inequities, Responses*. Washington, D.C.: American Psychological Association, and ecoAmerica.

¹⁷ IPCC 2023.

¹⁸ National Academies of Sciences, Engineering, and Medicine. 2016. *Attribution of Extreme Weather Events in the Context of Climate Change*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/21852>.

¹⁹ Philip, S., Kew, S., van Oldenborgh, G. J., Otto, F., Vautard, R., van der Wiel, K., King, A., Lott, F., Arrighi, J., Singh, R., and van Aalst, M.: A protocol for probabilistic extreme event attribution analyses, *Adv. Stat. Clim. Meteorol. Oceanogr.*, 6, 177–203, <https://doi.org/10.5194/ascmo-6-177-2020>, 2020.

²⁰ <https://www.ametsoc.org/ams/publications/special-collections/explaining-extreme-events-from-a-climate-perspective-ams-special-collection/>

²¹ <https://www.worldweatherattribution.org/event-papers/>

²² <https://www.ucs.org/sites/default/files/attach/2018/06/extreme-weather-Appendix-A2.pdf>

acidification and sea level rise, to the heat-trapping emissions from major fossil fuel companies and cement manufacturers.^{23,24}

The economic toll of climate change is rising. The EPA’s peer-reviewed 2023 estimates for the social cost of greenhouse gases demonstrate the significant economic harms of climate change and the benefits of reducing these emissions.^{25,26} Data from the National Oceanic and Atmospheric Administration (NOAA) show that billion-dollar disasters in the United States are on the rise, driven by a combination of climate factors and increased development in disaster-prone areas.^{27,28} A recent US Department of Treasury report found that climate hazards pose a threat to US household finances, disproportionately harming low-income households.²⁹ Another recent Treasury report highlights the impacts of climate change on US insurance markets, and found that consumers living in ZIP codes most exposed to climate-related perils are paying higher premiums and face higher non-renewal rates than those in the lowest climate risk ZIP codes.³⁰

Mischaracterizing these scientific facts as a means to impede EPA regulations to limit heat-trapping emissions—as well as ignoring the painful reality of people’s experiences—will harm people and the economy.³¹

Climate change requires collective national and global action because it is caused by heat-trapping emissions building up and persisting in the atmosphere. The combined rising atmospheric concentrations of the six main greenhouse gases noted in the Endangerment Finding—carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur

²³ Sadai, Shaina, Carly Phillips, and Delta Merner. 2025. Tracing the Tides: How Major Carbon Producers Drive Sea Level Rise and Climate Injustice. Cambridge, MA. Union of Concerned Scientists. <https://doi.org/10.47923/2025.15818>

²⁴ Kristina A Dahl et al 2023 *Environ. Res. Lett.* **18** 064011 DOI 10.1088/1748-9326/acbce8

²⁵ <https://www.epa.gov/environmental-economics/scghg>

²⁶ The damage costs of an additional ton of carbon dioxide emitted in 2025 are estimated to be \$212 (in 2020 dollars, assuming a 2% discount rate). See table A.5.1 (Annual Unrounded SC-CO₂, SC-CH₄, and SC-N₂O Values, 2020-2080) in: EPA, 2023. EPA Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances. https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf

²⁷ According to NOAA, ‘The total cost of U.S. billion-dollar disasters over the last 5 years (2020-2024) is \$746.7 billion, with a 5-year annual cost average of \$149.3 billion. This 5-year cost average is more than double the 45-year (1980-2024) annual cost average of \$64.8 billion for all of the billion-dollar disaster events.’ (All data adjusted for inflation). NOAA. 2024. An active year of U.S. billion-dollar weather and climate disasters. <https://www.climate.gov/news-features/blogs/beyond-data/2024-active-year-us-billion-dollar-weather-and-climate-disasters>

²⁸ NOAA will no longer be updating this database due to changes forced by the Trump administration. <https://www.nesdis.noaa.gov/news/billion-dollar-weather-and-climate-disasters>

²⁹ The report found harms included loss of income and benefits, business interruptions, damage to property, and increased costs of goods and services. U.S. Department of the Treasury. 2023. The Impact of Climate Change on American Household Finances. https://home.treasury.gov/system/files/136/Climate_Change_Household_Finances.pdf

³⁰ According the report: “From 2018 to 2022, consumers living in the 20 percent of ZIP Codes with the highest expected annual losses to buildings from climate-related perils paid \$2,321 in [yearly] premiums on average, 82 percent more than those in the 20 percent lowest climate-risk ZIP Codes.” Also: “Consumers in the highest risk ZIP Codes faced higher policy nonrenewal rates, with average nonrenewal rates about 80 percent higher than those in the lowest risk ZIP Codes.” U.S. Department of the Treasury. 2025. Analyses of U.S. Homeowners Insurance Markets, 2018-2022: Climate-Related Risks and Other Factors. https://web.archive.org/web/20250722071031/https://home.treasury.gov/system/files/311/Analyses_of_US_Homeowners_Insurance_Markets_2018-2022_Climate-Related_Risks_and_Other_Factors_0.pdf

³¹ Independent of their role in driving climate change, carbon dioxide (CO₂) and methane (CH₄) emissions are also directly harmful. CO₂ emissions produce direct harms via ocean acidification and CH₄ emissions degrade air quality.

hexafluoride (SF₆)—exert warming effects that in turn drive accelerating climate impacts.³² Limiting harmful impacts to human health and well-being, now and in the future, will require cutting these emissions across sources. Robust action from the United States, a leading contributor to global heat-trapping emissions,³³ is crucial to meeting global climate goals to curtail the worst impacts of climate change.

The world stands on the cusp of breaching the 1.5°C (2.7°F) mark on a long term basis, the global average temperature increase above pre-industrial levels that scientists have long warned about.^{34,35} Communities across the nation are already dealing with devastating and costly climate impacts, that are set to worsen as global warming accelerates. Humanity's window to act to stave off some of the worst impacts of climate change is fast closing; any further delay is harmful and costly.

We urge you to stop dismantling critical climate regulations and evading EPA's responsibility by pushing disinformation about climate science and impacts. Instead, we call on you to act with urgency to help address this pressing challenge by limiting heat-trapping emissions. People across the nation are relying on the EPA to fulfill its mission to protect public health and the environment.

³² Alongside the atmospheric build-up of heat-trapping emissions, carbon dioxide is also being absorbed by the oceans, causing ocean acidification and consequent negative impacts on marine life and ecosystems.

³³ The United States is the second largest contributor to annual heat-trapping emissions and the largest contributor to these emissions on a historical basis.

³⁴ World Meteorological Organization (WMO). 2025. Decadal Climate Update (2025-2029)

³⁵ Bevacqua, E., Schleussner, CF. & Zscheischler, J. A year above 1.5 °C signals that Earth is most probably within the 20-year period that will reach the Paris Agreement limit. *Nat. Clim. Chang.* **15**, 262–265 (2025).

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