Rachel Carson Council Comment: Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards
(Docket ID: EPA-HQ-OAR-2025-0194)

The Rachel Carson Council (RCC), a national environmental organization dedicated to protecting human health and the natural world, submits this comment in strong opposition to the Environmental Protection Agency's ("EPA") reconsideration of the 2009 Endangerment Finding under §202(a) of the Clean Air Act and its efforts to weaken greenhouse gas (GHG) vehicle standards. Rescinding or weakening these determinations would defy the scientific consensus on climate change, endanger the American public, and contradict EPA's statutory duty.

The 2009 Endangerment Finding correctly concluded that greenhouse gases, including carbon dioxide, methane, nitrous oxide, and others, pose a danger to public health and welfare.[i] This conclusion was supported by decades of peer-reviewed scientific research and the overwhelming consensus of the global scientific community.[ii]

In the years since then, the evidence supporting the Endangerment Finding has only grown stronger and more dire. Major scientific bodies including Intergovernmental Panel on Climate Change, the National Academies of Sciences, Engineering, and Medicine, and the U.S. Global Change Research Program have all affirmed the central role of human-caused greenhouse gas emissions in driving climate change.[iii]

To rescind the Endangerment Finding would threaten the lives of millions of Americans already suffering the consequences of climate change. Since 2009, Americans have lived through record-breaking wildfires, intensifying hurricanes, deadly heat waves, and catastrophic flooding. [iv] Greenhouse gas emissions, vehicle pollution, and climate disruptions are not abstract problems. They are destroying lives, homes, communities, and ecosystems now.[v]

At the same time, they are having long-term serious impacts on our health and welfare.[vi] These impacts fall hardest on children, the elderly, people with preexisting health conditions, and those from low-income neighborhoods, who already face disproportionate burdens of asthma, heat stress, and toxic exposures.[vii] Rolling back protections will further entrench these disparities and contradict EPA's statutory duty.

The EPA's mission is to protect human health and the environment. To rescind the Endangerment Finding would betray that mission. It would also ignore the Supreme Court's decision in *Massachusetts v. EPA*, which requires the EPA to take action under the Clean Air Act to curb emissions of carbon dioxide (CO_2), methane, and four other heat-trapping air pollutants. [viii] These pollutants, collectively recognized as greenhouse gases, contribute to climate change and thereby "endanger public health and welfare."[ix] Accordingly, Courts have consistently held that the EPA has both the statutory obligation[x] and the legal authority to regulate greenhouse gas emissions from major sources. [xi]

Rachel Carson warned that "The 'control of nature' is a phrase conceived in arrogance."[xii] Her words are prescient. EPA's reconsideration of the Endangerment Finding and weakening of vehicle GHG standards reflects precisely this arrogance by denying science and ignoring the human toll of climate change.

The RCC urges the EPA to reaffirm the 2009 Endangerment Finding and to strengthen, not weaken, vehicle greenhouse gas standards. Protecting public health, upholding climate science, and safeguarding the natural world are not optional, they are the EPA's legal and moral responsibilities.

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[i] *Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act*, Endangerment Finding, 74 Fed. Reg. at 66,497. (Dec. 15, 2009), https://www.govinfo.gov/content/pkg/FR-2009-12-15/pdf/E9-29537.pdf.

[ii] *Id.*

[iii] NAT'L RESEARCH COUNCIL, AMERICA'S CLIMATE CHOICES 15–16 (Nat'l Acads. Press 2011), https://nap.nationalacademies.org/catalog/12781/americas-climate-choices. INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE, *Climate Change 2021: The Physical Science Basis* 3–4 (Valérie Masson-Delmotte et al. eds., Cambridge Univ. Press 2021), https://www.ipcc.ch/report/ar6/wg1/;
U.S. GLOB. CHANGE RESEARCH PROGRAM, *Fifth Nat'l Climate Assessment* 29–30 (2023), https://repository.library.noaa.gov/view/noaa/61592/noaa_61592_DS1.pdf.

[iv] NAT'L OCEANIC & ATMOSPHERIC ADMIN., *Billion-Dollar Weather and Climate Disasters* (2023), https://www.ncei.noaa.gov/access/billions/

[v] U.S. ENVTL. PROT. AGENCY, *Climate Change Indicators: Heat-Related Deaths & Illnesses*, https://www.epa.gov/climate-indicators/climate-change-indicators-heat-related-deaths, (last visited Sept. 22, 2025).
NAT'L OCEANIC & ATMOSPHERIC ADMIN., *Weather Related Fatality and Injury Statistics*, https://www.weather.gov/hazstat (last visited Sept. 22, 2025).

[vi] NAT'L ACADS. OF SCIENCES, ENGINEERING, & MEDICINE, *Effects of Human-Caused Greenhouse Gas Emissions on U.S. Climate, Health, and Welfare* (2025), https://www.nationalacademies.org/our-work/report/effects-of-human-caused-greenhouse-gas-emissions-on-us-climate-health-and-welfare (last visited Sept. 22, 2025) (noting that climate change intensifies risks to humans from exposures to extreme heat, ground-level ozone, airborne particulate matter, extreme weather events, and airborne allergens, affecting incidence of cardiovascular, respiratory, and other diseases).

[vii] U.S. ENVTL. PROT. AGENCY, Climate Change and Social Vulnerability in the United States: A Focus on Six Impacts (2021), https://www.epa.gov/cira/social-vulnerability-report.
(last visited Sept. 22, 2025).

[viii] *Massachusetts v. EPA*, 549 U.S. 497 (2007).

[ix] *Id.*

[x] 42 U.S.C. § 7521(a)(1) (2018).

[xi] *Endangerment Finding, supra* note ii, at 66,497.

[xii] CARSON, R., SILENT SPRING, 297 (Houghton Mifflin 1962).