



August 13, 2025

Administrator Lee Zeldin
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

Re: Request for Extension of Comment Period — Docket EPA-HQ-OAR-2025-0194

Dear Administrator Zeldin:

The American Lung Association requests that the U.S. Environmental Protection Agency extend the public comment period for the proposed rule titled *Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards*.

Under the Clean Air Act, EPA is required to provide the public a “reasonable period for participation.” In light of the sweeping nature of the proposal, the stakes involved and the legal and scientific arguments it covers, we believe that an extension to a comment period of at least 120 days or December 1, 2025 is necessary to enable meaningful and informed public comment.

The current comment window—set to close on September 15, 2025—does not allow sufficient time for health professionals, legal scholars, scientists, affected communities, state and local officials and other stakeholders to fully analyze the proposed rule’s legal, scientific, and technical assertions. The rule includes complex legal reinterpretations, numerous technical references and justifications that demand careful review. Moreover, the proposed repeal does not appear to provide quantification of the public health and climate impacts that would result from the elimination of these long-standing protections. Such omissions make stakeholder review and input all the more essential.

This proposed rule is sweeping in both scope and potential impact. It seeks to rescind the endangerment finding for greenhouse gases under the Clean Air Act and to repeal all greenhouse gas emission standards for light, medium, and heavy-duty vehicles. These are among the most consequential regulatory actions the EPA has proposed in recent memory, with far-reaching implications for public health, air quality, climate stability, vehicle emissions and regulatory precedent. Previous agency considerations of these topics allowed for multiple separate, dedicated proposals coupled with analysis of their

impact. Condensing these repeals together on an accelerated timeline will likely stifle meaningful engagement from a broad suite of stakeholders.

The proposed comment period and public hearing timeline also violates the Clean Air Act Section 7607(d)(5), which requires that the opportunity to comment be left open for 30 days after the completion of the public hearing. The law states that the Administrator “shall keep the record of such proceeding open for thirty days after completion of the proceeding to provide an opportunity for submission of rebuttal and supplementary information.” While we maintain the necessity for a 120-day comment period, we also note that this statute requires the comment period to close no earlier than September 22.

We urge EPA to grant an extension of the comment period to 120 days, and, at the very least, to the timeframe required by the law to ensure that those affected have a fair opportunity to participate in this critical rulemaking process.

Thank you for your consideration of this request.

Signed,

American Lung Association