

Comments of William Barrett  
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Reconsideration of 2009 Endangerment Finding  
and Greenhouse Gas Vehicle Standards  
Docket ID No. EPA-HQ-OAR-2025-0194  
As prepared for delivery

Good morning. My name is Will Barrett. I am the Assistant Vice President for Nationwide Clean Air Policy with the American Lung Association.

I am speaking today in opposition to the proposal to repeal the Endangerment Finding and to eliminate current and past greenhouse gas standards for all light-, medium- and heavy-duty vehicles that constitute the largest single source of climate pollution that risks human health.

The Lung Association and leading health and medical organizations are unified in strong opposition to these drastic proposals that have been put forward without the scientific rigor or analysis that have – to this point – been the standard for decisions regarding the protection of human health in the United States.

Over my lifetime, there have been over 400 extreme weather and climate-related disasters documented by the National Oceanic and Atmospheric Administration. These American climate tragedies have been estimated to have caused nearly \$3 trillion in damages. The pace of increase in these events is alarming from a broad economic perspective and devastating for the increasing numbers of families, first responders and entire communities caught in the path of extreme storms, floods, fires and smoke.

The passenger vehicles and heavier trucks included in the proposed repeal represent the largest share of our nation's contribution to global climate change. The U.S. vehicle fleet also represents the world's largest source of greenhouse gases in the transport sector. Ignoring this, the proposal relies on a range of so-called justifications for the combined repeal of the Endangerment Finding and the full suite of past, present and future standards.

One stated example is that there is a lack of technology available. Manufacturers have met climate reduction standards with a wide range of technologies proven to cut greenhouse gases, including cleaner combustion engines, ever-increasing engine efficiencies and zero-emission technologies. It is disingenuous to attempt a justification for repeals by declaring both that existing rules are a technology mandate (when they are demonstrably not) and that there are no technologies available to meet the job (which is also untrue).

EPA's proposals amount to a large dose of uncertainty for American manufacturers, uncertainty for the health of America's children and uncertainty for the pocketbooks of American families tied volatile fossil fuel markets.

EPA must adhere to the law, to the science and to a basic contract with the American people to protect their health, as has been the stated mission for vehicle standards for over fifty years.

I urge you to listen to the overwhelming consensus of the peer-reviewed scientific literature, to rescind these proposals and return to critical work of protecting American families.