

**Comments of Ann Mesnikoff, Federal Legislative Director
Environmental Law & Policy Center for EPA's Public Hearing on Reconsideration of
2009 Endangerment Finding and Greenhouse Gas Vehicle Standards**

Docket ID No. EPA-HQ-OAR-2025-0124

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My name is Ann Mesnikoff. I am the Federal Legislative Director for the Environmental Law & Policy Center.

ELPC works across the Great Lakes Midwest region.

EPA should withdraw this proposal. The Clean Air Act requires EPA to protect people from “any air pollutant” that it deems “causes or contributes to air pollution that may reasonably be anticipated to endanger public health or welfare.” The science that underpinned the 2009 Endangerment Finding remains sound and has only gotten stronger.

EPA can try to distance itself and Americans from the impacts of climate change by consistently referencing “global climate change concerns” in this flawed proposal, but across the country and in the Great Lakes region, we are all seeing, experiencing and paying for the consequences of greenhouse gases and the climate change they drive.

In 2019, ELPC published an [Assessment of the Impacts of Climate Change](#) on the Great Lakes by leading Midwest scientists. This assessment examined the current and projected impacts of Climate Change on the Great Lakes and the surrounding region. Just last month, some of these scientists [updated their assessment](#) furthering our understanding of how climate change driven by GHGs is directly impacting the health, lives and environment of the tens of millions of people across the region. These reports will be in the docket.

The Endangerment Finding and the vehicle standards that came after it do not turn section 202(a)(1) of the Clean Air Act into a “roaming license to prescribe standards.” The result has been standards for the leading source of US GHGs (motor vehicles) that save lives and benefit consumers.

According to EPA the 2024 Multipollutant Standards provide significant consumer and health benefits that will be lost if EPA pursues this harmful rescission standards. We risk losing \$13 billion in annual health benefits, \$46 billion in reduced annual fuel costs, and nearly \$16 billion in reduced annual maintenance and repair costs for drivers.

The existing standards were never an EV mandate, contrary to claims. The pollution standards for light and medium duty standards were technology neutral with multiple pathways for compliance that promised consumers choices.

EPA's updated GHG standards for heavy-duty trucks also put technologies to work to cut GHGs and deliver substantial public health and economic benefits.

The standards EPA now seeks to rescind are a win, win. EPA is proposing to deliver a massive lose, lose plan – one that undermines consumers, investments and the competitiveness of the auto industry, and it will put the public, the Great Lakes region, the entire country and the globe at greater risk of climate chaos.

EPA should withdraw this dangerous proposal.

ELPC will be submitting additional comments to the docket.

Thank you for the opportunity to testify today.