

**Comments of Environmental Law & Policy Center at EPA's Public Hearing on
Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle
Standards**

Docket ID No. EPA-HQ-OAR-2025-0194

Callie Sharp

Associate Attorney

Environmental Law & Policy Center

August 20, 2025

My name is Callie Sharp. I am an associate attorney at the Environmental Law & Policy Center – a Midwest-based public interest organization dedicated to action and advocacy for improving environmental quality and protecting natural resources.

The Endangerment Finding is underpinned by sound science, including thousands of studies and comprehensive assessments from reputable organizations like the National Academy of Sciences, the Intergovernmental Panel on Climate Change, and many others.

EPA itself stated the following about these scientific assessments. “No other source of information on climate change provides such a comprehensive and in-depth analysis across such a large body of scientific studies and adheres to such a high and exacting standard of peer review.”¹

EPA reaffirmed this position in 2022, stating that “the evidence accumulated since 2009, particularly as compiled in recent scientific assessments, only ‘strengthens [EPA’s] understanding of the climate system and the impacts that greenhouse gases have on public health and welfare for both current and future generations’ and thus bolsters the original basis for the 2009 Finding.”² Since then, scientific evidence of the significant risk of harms from greenhouse gas emissions has only continued to grow.

Now, however, EPA discounts this robust peer-reviewed body of literature in exchange for a handful of “critiques” which it fails to cite, and for the secretly and frantically compiled draft report of a “Climate Working Group.” It is no coincidence that each member of this group has an extensive history of questioning the consensus of approximately 99% of published, peer-reviewed literature about the anthropogenic cause of climate change and its impacts on public welfare. This resulted in a biased assessment which could serve as a masterclass in the manipulation of data to serve a political goal. It cherry-picks only that data which supports this Administration’s narrative and ignores the substantial majority of the literature that does not. The report violates the basic tenets of scientific ethics and must be dismissed.

Repealing the Endangerment Finding would go against science and EPA’s core mission to protect public health and the environment.

ELPC will offer further written comments illustrating that the proposed repeal is not supported by EPA’s rationale. We urge EPA to rescind its proposal and to protect people over polluters.

¹ 74 Fed. Reg. 66496, 66511.

² Final Brief of Respondent, *Concerned Household Elec. Consumer Council v. EPA*, No. 22-1139 1, 31 (D.C. Cir. Feb. 21, 2023) (quoting EPA’s Denial of Petitions Relating to the Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act, ENVTL. PROT. AGENCY (2022), 11, https://www.epa.gov/system/files/documents/2022-04/decision_document.pdf.)