

U.S. Environmental Protection Agency,  
EPA Docket Center, OAR,  
**Docket EPA-HQ-OAR-2025-0194, Mail Code 28221T,**  
1200 Pennsylvania Avenue NW, Washington, DC 20460

**RE: Business Leaders and Investors OPPOSE EPA's proposal to revoke the greenhouse gas endangerment finding and greenhouse gas vehicle emissions standards.**

Dear EPA Administrator Zeldin:

As business leaders and investors, we **strongly oppose any effort to revoke the EPA's Endangerment Finding on greenhouse gas (GHG) emissions** and urge the agency to **uphold and enforce robust GHG vehicle standards** that drive innovation, save consumers money, and support U.S. competitiveness.

While the agency has suggested that the costs of complying with GHG reductions are high for companies, failing to regulate greenhouse gas emissions carries far broader and more damaging economic consequences. Rising GHG emissions are already costing American businesses and workers:

- **Labor productivity losses** from extreme heat—made more frequent and severe by GHG emissions -- are projected to reach **\$221 billion per year** by 2090<sup>1</sup>.
- **Crop disruptions** from GHG-related shifts in weather and growing seasons are destabilizing food prices and rural economies<sup>2</sup>.
- **GHG-linked disasters** delay deliveries, damage infrastructure, and strain supply chains, resulting in billions in annual business losses<sup>3</sup>.
- **GHG-related public health costs** from heat-related illness, disease spread, and emergency response add pressure to health systems and workforce availability<sup>4</sup>.

By contrast, strong GHG regulation -- especially vehicle standards—create substantial economic value. Transportation is the **largest source of U.S. GHG emissions**, and federal GHG standards for vehicles are critical for reducing emissions **while saving consumers and businesses money**:

- Clean car standards are projected to **save U.S. drivers \$1.6 trillion in fuel costs** over the lifetime of affected vehicles<sup>5</sup>.
- They provide **long-term market certainty** for automakers, suppliers, and investors across the U.S. transportation and clean energy sectors.

- Cleaner vehicles reduce health care costs tied to emissions exposure, benefiting both public health and employer insurance burdens<sup>6</sup>.
- The U.S. auto industry is competing globally in the transition to low-emissions transportation; rolling back standards **risks ceding leadership to other nations and losing U.S. manufacturing jobs**<sup>7</sup>.

Regulation is essential because the harms of emissions and benefits of reductions are widely dispersed. Individual companies lack incentive to act alone; without enforceable standards and the level playing field they provide, businesses may underinvest in emissions reductions, fearing competitive disadvantages. Only enforceable standards can ensure broad participation across industries and meaningfully reduce shared economic and public health harms<sup>8</sup>.

Public health and economic resilience are tightly linked when it comes to GHGs. If unchecked, GHG-driven disasters are expected to cut U.S. GDP by **10% annually by 2050**<sup>9</sup>. Vehicle standards offer cost-effective emissions reductions that also stabilize fuel and logistics costs, helping to reduce inflationary pressures<sup>10</sup>.

For all these reasons, we strongly oppose any effort to revoke the EPA's Endangerment Finding on GHG emissions and urge the agency to uphold and enforce strong GHG vehicle standards.

Thank you for considering these comments,

Sincerely,

(177 Business Signatories):

Dan Abrams President/CEO Wynkoop Properties	Stephen Aiguier President Green Hammer	Shauna Alexander Stumptown Coffee Roasters
Brian Allen Managing Director Appropriate Technology Group	Larry Aller Partner Redwood Ridge	Alexandra Amonettte President Sweetgrass Associates
John Andersen President Greenleaf Advisors	Vanessa Andersen Ferrara	Emily Applegate Strategy Director Neuroplasticity Alliance

Jodi Bakst Owner Real Estate Experts	Melissa Baldridge Owner Big Glasses Consulting	Jay Baldwin President Wind River Capital Partners
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Daryl Beardsley Industrial Environmental Engineer Beardsley Environmental Strategies	Jason Beck Founding Member Zettawatts	Annette Beitel Future Energy Enterprises, LLC
Dave Belote Managing Partner & CEO DARE Strategies LLC	Jeffrey Bennett Owner Big Kid Science	Chris Bentley Founder Pet Sustainability Coalition
Eric Berman Owner MyFlightbook	Ralph Bicknese Architect Hellmuth + Bicknese Architects	Maureen Blanc Director Charge Across Town
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## Endnotes

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