

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 2090¹.
- **Crop disruptions** from GHG-related shifts in weather and growing seasons are destabilizing food prices and rural economies².
- **GHG-linked disasters** delay deliveries, damage infrastructure, and strain supply chains, resulting in billions in annual business losses³.
- **GHG-related public health costs** from heat-related illness, disease spread, and emergency response add pressure to health systems and workforce availability⁴.

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 vehicles⁵.
- 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 burdens⁶.
- 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**⁷.

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 harms⁸.

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**⁹. Vehicle standards offer cost-effective emissions reductions that also stabilize fuel and logistics costs, helping to reduce inflationary pressures¹⁰.

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 Amonette
President
Sweetgrass Associates

John Andersen
President
Greenleaf Advisors

Vanessa Andersen
Ferrara

Emily Applegate
Strategy Director
Neuroplasticity Alliance

Jodi Bakst
Owner
Real Estate Experts

Mary Barber
Peak Alliance for a
Sustainable Future

Daryl Beardsley
Industrial Environmental
Engineer
Beardsley Environmental
Strategies

Dave Belote
Managing Partner & CEO
DARE Strategies LLC

Eric Berman
Owner
MyFlightbook

Barbara Blumenthal
Principal
Blumenthal Consulting

David Bowen
Software Engineering Manager
Retired

Meghan Brookler
Build Meaning

Cliff Chapman
CEO
Syncarpha Capital

Melissa Baldrige
Owner
Big Glasses Consulting

Jason Beck
Founding Member
Zettawatts

Jeffrey Bennett
Owner
Big Kid Science

Ralph Bicknese
Architect
Hellmuth + Bicknese
Architects

Gayle Borst
President/CEO
Stewardship Inc

Brian Braginton-Smith
President/CEO
Lewis Bay Research Center
Inc

James Butler
Chief Technology Officer
(CTO)
Cimetrics Inc.

David Cohen-Tanugi
Vice President
Pine Island New Energy
Partners

Jay Baldwin
President
Wind River Capital Partners

Mark Bauhaus
Principal
Bauhaus Productions

Annette Beitel
Future Energy Enterprises, LLC

Chris Bentley
Founder
Pet Sustainability Coalition

Maureen Blanc
Director
Charge Across Town

Dara Bortman
Founder/CEO
Sustainable Solar Systems
LLC

Marc Brener
Owner
Saddleback Energy Consulting

Macen Cabral
Millig DB

Elise Couillard
Owner
Elise Couillard LLC

Peter Crawley
Managing Partner
Satoria Sustainability

Mica Crouse
Founder
Big Mountain Impact LLC

Alexis Cureton
Business Development
Analyst
COI Energy

Chris Daum
President
Oasis Montana Inc.

George Day
CEO
Weather Blanket Insulation

Renaud des Rosiers
Director of Sustainability
Amy's Kitchen

Fran DiDonato
Of Counsel
Hubay Dougherty

Michael Dolce
Owner/Architect
Michael P Dolce AIA Architect

Scott Englander
President
Longwood Energy Group

Bob Epstein
Co-Founder
Project 2030

Rob Erlichman
Owner
Sunlight Electric, LLC

Edilo Escobar
CEO
Solares Energy Efficiency
Solutions Inc

Areana Flores
Senior Staff
Bay Area Air Quality
Management District

Chef Christopher Galarza
Forward Dining Solutions LLC.
EcoChef

Deborah Galle
Board of Directors
CWRA

Dennis Garrett
CEO
Blue Lake Clean Energy Group
LLC

Roy Garza
Workforce development
Coordinator
Grid Alternatives

Jesse Goldstein
Senior Analyst
Stanford University

Debora Good
Technology Transfer
Consultant
IVT

Ben Gordesky
Solar Development Manager
Energy Efficient Investments

Cambria Gordon
Author

Rick Gowins
Owner/Manager
Tibre Enterprises

Donald Green
Sr Project Manager
Progressive Companies

Joshua Green
CEO & Founder
Inspiration Mobility Group,
LLC

Timson Green
Manager
ARROW EXTERMINATORS

Tom Grimes
Chief Revenue Officer
Spotlight Solar, Inc.

Jon Guice
CEO
AltaTerra Energy

Cara Gunderson
Sr Asset Manager
Scout Clean Energy

Cayman Handley
Marketing Manager
Greater Perimeter Chamber

Isaac Harper
Program Manager
Georgia Cleantech Innovation
Hub

Tom Harriman
President
Solar by Harrimans

RJ Harrington
President and CEO
Sustainable Action Consulting
PBC

Ellen Harris-Harvey
External Engagement
Coordinator
Buffalo Olmsted Parks Cons.

Natalie Hartkopf
Owner & CEO
Hightower Group LLC

Lynn Heller
CEO
Climate Access Fund

Deirdre Henderson
Partner
Henderson & Koplik LLP

Matthew Highland
Asset Manager
Clearway Energy

Jenny Hill
Executive Director
4CORE

Patrice Horner
Utility Transformation
Consortia

Alec Houpt
CEO
Inertial Technologies Inc.

Ann Hughes
Founder
OutWest

Sylvester Iro
CEO
Solar Start Ltd LLC

Aaryn Jackson
Sustainability Project Manager
Energy Logic

Edwin Jaros
Executive
Applied Cleantech Research

Bill Jordan
CEO
Jordan Energy & Food
Enterprises, LLC

Warren Kahn
Owner
Warren Kahn Life Coaching

Kaveh Kamooneh
Better Tomorrow Solar, Inc

Bob Keefe
Executive Director
E2

Gregory King
Managing Director
TSK Energy Solutions

Karl Kleissner
President
KD Cura Corp.

Steve Krug
Principal
Krug Architects

Dale Landmann
Sampling Manager
Current

Joyce Lane
SD350

Beva Langdon
President
Biotext

Jean Larson
Physician

Patrick Le
Capital Projects Engineer
Sonoma Clean Power

Jeffrey Leagon
President
Alsace-Carolina, LLC

Nicole Lederer
Chair and Co-founder
Environmental Entrepreneurs

Karen Lewis
Consultant

Church Lewis
Partner
CR Advisors

Andreas Lips
Entrepreneur in Residence
Stauro Capital

Michael Lischer
Architect, Design +

Patricia Lloyd
Director of Sustainability
Leopardo Construction

Heidi Lubin
Principal
eSix Development Partners

Jason Ludwigson
EcoThriveLLC

Annarie Lyles
Managing Director
Bio-Gist Ventures

David Mann
Corp. President
MPI SolarLLC

Michael Mann
President
Cyan Strategies

Ilyssa Manspeizer
CEO
Landforce

James Marshall
Executive Vice President
Raven Ridge Resources

Tom McCalmont
CEO
Paired Power, Inc.

Jeff McDermott
Contrator

John McGarry
Investor
E8

Dennis McGinn
CEO
Kelden Group

Andrew Mendelsohn
Executive Vice President
(retired)
Oracle Corp.

John Merrill
Owner
Merrill Images

Finn Montague
Commercial Property Manager

Bill Morgan
General Manager
Energy Services Group

Rebecca Morris
Director of Marketing
Pisgah Energy

Mitrajit Mukherjee
President
Exelus Inc

Ian Myjer
Engineer
Luminary

Nancy Nancy
Owner
Nancy D'Angelo Handweaver

Carl Nettleton
President
Nettleton Strategies

Armand Neukermans
CEO
Adagio

Aaron Newman
Staff Software Engineer,
Anode Technologies

Kim Nigro
Studio Nigro Architecture +
Design

James Noden
CEO/ Founder
Bright Eye Solar LLC

Standish O'Grady
Managing Director
Granite Ventures, LLC

Shaun Paul
President
People & Planet

Ri Prasad
Managing Director
AR2 Homes

Micaela Preskill
E2

Kasey Provorse
Executive Director
Energy Smart Colorado

Jennifer Quas
Account Manager
Chint Power Systems (CPS)
America

Jan Rasmussen
CEO
Jan Rasmussen Media
Relations

Marcus Redden
Chief Executive Officer
Energy Resource Center

John Robbins
Owner/CEO
Greathorn LLC

David Rosenheim
Executive Coach
Align Coaching and Wellness,
LLC

Conner Rudzinski
Founder
Solacia

Francis Sandoval
Principal
Pajarito Technologies

Su Sanni
Dollaride

Elena Savona
President
ES Consulting

Glenn Schiffbauer
Executive Director
Santa Fe Green Chamber of
Commerce

Ilana Schoenfeld
Media Development Director
Hoot Owl Media

Paul Scott
Chief Technology Officer
(CTO)
Rocketruck

Brad Seaman
VP of Mergers and
Acquisitions (M&A)
Scout Clean Energy

Norman Seip
Owner
Independent Contractor

Tim Sexton
Founder
Principal, Make Good Group

Lane Sharman
President
Open Doors Management

Toby Shea
Senior Director of Technology
Program Management
Capital One

Sherrie Trefry
Energy Market LeaderVHB

Sheila Sipes
Whitney Architects | Q Design

Felicia Slaton-Young
Greater Englewood Chamber
of Commerce

Debra Smit
Director of Communications
Breathe Project

Todd Solomon
US Federal Policy, ZeroAvia

Angela Son
CEO
The Green Launchpad

Roger Sorkin
Exec. Dir.
American Resilience Project

Robert Sotolongo
Architect
DTW Architects

Mark Stenftenagel
CEO
Whitney Inc.

Caroline Strong
Executive Assistant
Solar States

Karen Sweeney
Director of Sustainability
5

Randy Talley CEO Green Sage Cafe	Sven Thesen Founder BeniSolinHI, LLC	Andrew Thomaides President Entegro
Greg Thomson Founder Green Solutions & Technologies	Bob Thronson VP Marketing & Business Development Vigilent	John Tourtelotte Managing Director Rivermoor Energy
Roger Ullman Founder and Director Hayata Enterprises	Bill Unger Partner Robleda Partners	Amy Van Beek COO Ideal Energy
Thomas Van Dyck RBC SRI Wealth Management	Charlotte Walker President & Founder TSF Management, Inc.	Jim Walker Founder & Principal Cleantech Adoption LLC
Jamie Wallace Principal RNG Future, LLC	Kimi Wei CEO The Wei LLC	John Wilkerson Nomad Energy Group LLC
Tony Williams Director	William Wilms Owner Advance Renewables	Michelle Wiseman Atlanta Sustainability Ambassadors
M Yang Founder and Former Executive of Biotech Company	Louis Zeller Motion Designer 456	

Endnotes

1. Graff Zivin & Neidell, *American Economic Review*, 2014. <https://www.aeaweb.org/articles?id=10.1257/aer.104.7.2183>
2. USDA Climate Hubs. <https://www.climatehubs.usda.gov/>
3. E2, *Billion Dollar Losses, Trillion Dollar Threats*. <https://e2.org/reports/cost-of-climate-change/>
4. USGCRP, 2018; CDC, 2022. <https://nca2018.globalchange.gov/chapter/14/>; <https://www.cdc.gov/climateandhealth/effects/default.htm>

5. U.S. DOT & EPA, *Safer Affordable Fuel-Efficient Vehicles Rule*, 2020.
<https://www.nhtsa.gov/corporate-average-fuel-economy/safe>
6. EPA, *Regulatory Impact Analysis for GHG Emissions and Fuel Efficiency Standards*, 2023. <https://www.epa.gov/regulations-emissions-vehicles-and-engines>
7. Rhodium Group, “The U.S. Automotive Trade Balance in a Changing Global Market,” 2022. <https://rhg.com/research/us-auto-trade/>
8. Gillingham & Stock, *Journal of Economic Perspectives*, 2018. <https://www.aeaweb.org/articles?id=10.1257/jep.32.4.53>
9. Swiss Re, 2021. <https://www.swissre.com/media/news-releases/nr-20210422-economics-of-climate-change.html>
10. Wall Street Journal, “Blame Bad Weather for your Bigger Bills,” 2023. <https://www.wsj.com/articles/blame-bad-weather-for-your-bigger-bills-11640640525>