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

September 22, 2025

Public Comments of Coalition for Clean Transportation Opposing Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards

INTRODUCTION

The Coalition for Clean Transportation (CCT) works to eliminate Minnesota's transportation-related climate emissions through the increased adoption and availability of sustainable and equitable electrification options, particularly for Black, Indigenous, and People of Color (BIPOC) and under-resourced communities who disproportionately bear the impact of climate change and air pollution, and experience high rates of mobility injustice. CCT envisions a future where all Minnesotans, from urban to suburban to rural, have equitable access to clean transportation options that promote health and connection for all.

CCT opposes the proposed rescission of the 2009 Greenhouse Gas Endangerment Finding and the removal of greenhouse gas standards from our federal vehicle emissions standards. While these standards are not and have never been a federal "EV mandate" — the newest round of vehicle pollution standards that are being targeted for rollback that don't require electrification or any other specific technology to improve engine performance – they are critical to ensuring increasing innovation by vehicle manufacturers to produce cleaner cars and trucks for sale in the U.S.

Additionally, rolling back vehicle pollution standards will damage our state economy by *increasing* transportation costs for Minnesotans through decreased access to more fuel-efficient vehicles, while *also* harming our health – particularly the health of the most vulnerable amongst us – and hampering the ability of our state to achieve its climate goals, all at a time of rising costs and fewer social safety nets due to actions of the current federal administration and lawmakers.

We outline the climate impacts Minnesota is already suffering from below, alongside the impacts to reaching our state's climate goals and increasing costs to consumers from less fuel-efficient and cleaner vehicles being made available.

MINNESOTA CLIMATE IMPACTS

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Minnesota is experiencing one of the most rapidly changing climates in the U.S., with average temperatures having risen 3 degrees Fahrenheit between 1895 and 2020.[1] Our winters are warming even faster, with average daily winter low temperatures rising more than 20 times

[1] Star Tribune, "U scientists: Minnesota is one of the nation's fastest-warming states" (Jan 2019)

faster than average daily summer high temperatures.[2] These changes have resulted in numerous negative impacts already, including more frequent and heavy rains that cause flooding and damage to homes and infrastructure.[3,4] The increased frequency of these extreme weather events has translated directly into increased costs to Minnesotans, who have seen insurance premiums rise by a whopping 366% since 1998.[5] Minnesota as a state has also seen a sharp increase in the costs imposed by extreme weather events, with 23 "billion-dollar disasters" occurring between 2020 and 2024, compared to 11 in the preceding decade (2010-2019).[6]

These climate impacts have well-documented effects on public health as well. For instance, increasing wildfire smoke from climate-fueled Canadian wildfires has caused an increasing number of "air quality alert" days when outdoor air is considered unhealthy for the general population, with 2023 setting a record 21 such alerts over 52 days, much higher than the previously expected 5 to 7 alerts in a year.[7] Increasing frequency of unhealthy outdoor air quality is especially dangerous to vulnerable populations such as the elderly, children, and those with health conditions like asthma. More bouts of extreme heat already occurring from climate change – alongside increasing higher humidity – in Minnesota also worsens air quality and places more stress on human health.[8,9]

For these reasons and more, Minnesota has set clear goals to reduce climate pollution in order to curb the worst impacts of climate change yet to come.

MINNESOTA TRANSPORTATION – CLIMATE & PUBLIC HEALTH

In 2023, Minnesota adopted a set of climate goals that reflect international standards for climate science.[10] These goals require Minnesota to decrease its climate emissions 50% by 2030, and reach net-zero emissions by 2050.[11]

The transportation sector is the largest source of climate pollution in Minnesota[12] and in the U.S. as a whole,[13] comprising 29% and 28% of 2022 greenhouse gas emissions, respectively. The

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[2] Minnesota Department of Natural Resources (MN DNR), "Climate Trends" webpage. Expand "Cold weather warming" section. Accessed Sept 2025.
[3] Minnesota Pollution Control Agency (MPCA), "Climate change impacts" webpage.
[4] University of Minnesota Climate Adaptation Partnership (UMN CAP), "How is climate change impacting the built environment in Minnesota?". Accessed Sept 2025.
[5] MPCA, "Climate impacts on infrastructure" webpage. Accessed Sept 2025.
[6] National Centers for Environmental Information, National Oceanic and Atmospheric Administration, "Billion-Dollar Weather and Climate Disasters: Minnesota Summary." Accessed Sept 2025.
[7] UMN CAP, "How is climate change affecting the health of Minnesotans?" under "air quality" section. Accessed Sept 2025.
[8] Minnesota Public Radio, "Extreme heat makes air quality worse - that's bad for health." (Sept 2023).
[9] UMN CAP, "How is climate change affecting the health of Minnesotans?" under "heat" section. Accessed Sept 2025.
[10] Natural Resources Defense Council (NRDC), "IPCC Climate Change Reports: Why They Matter to Everyone on the Planet," (April 2023). Minnesota's state climate goals align with the IPCC's recommendations on avoiding the worse impacts of climate change.
[11] MPCA, "Climate change trends and data" webpage. Accessed Sept 2025.
[12] *Id.*
[13] U.S. Environmental Protection Agency, "Sources of Greenhouse Gas Emissions" webpage. Accessed Sept 2025.

majority of these emissions in Minnesota come from passenger cars and light-duty trucks, which make up about 51% of our transportation sector's climate pollution. An increasing amount of Minnesota's transportation sector's climate emissions comes from heavy-duty trucks and delivery vans, as the latest report from the Minnesota Pollution Control Agency outlining sources of greenhouse gas emissions in the state note.[14] Together, passenger vehicles, light-duty trucks, and heavy-duty trucks account for a tremendous 73% of Minnesota's transportation sector climate emissions.[15]

To help reduce this large source of climate pollution, Minnesota adopted Advanced Clean Car I standards in 2021, which helped bring an increasing number of electric vehicles to the state. In 2024, electric vehicle sales reached 7.6% of all passenger vehicle sales – a huge increase from about 2% in 2021[16,17]. However these clean car standards only apply through model year 2025 vehicles, with the expectation for model year 2026 onwards that Minnesota will pivot back to federal vehicle emissions standards.

The current greenhouse gas standards encompassed in our current federal vehicle emissions standards are therefore crucial to helping curb the biggest source of Minnesota's transportation sector emissions as they cover not only passenger vehicles and light-duty trucks but also medium-and-heavy-duty vehicles. It has been well-documented from many groups that the federal vehicle emission standards will provide the regulatory backstop to continuing our nation's and state's urgent and necessary progress towards cleaner, zero-emission vehicles, with all the cost savings, climate, and public health benefits that go along with them.[18]

Looking beyond climate data, it's clear there are dire public health consequences at stake with the proposed rescission of greenhouse gas standards. Climate pollution hurts those experiencing poor air quality the hardest, including communities that live near highways. For example, within the state of Minnesota, neighborhoods in the 55411 ZIP code of North Minneapolis and other areas along the I-94 highway corridor face ER asthma related visits up to 5x more than the entire state.[19] These are the communities and individuals that will be disproportionately impacted should progress towards cleaner, zero-emission vehicles be stalled. Additionally, as mentioned above, increasing climate pollution has worsened our local air quality due to increasing smoke arriving over Minnesota from Canadian wildfires. While there are limited state and federal measures to address those Canadian wildfires, there is a clear way to reduce air pollution from another major source – transportation – by continuing a rapid transition to clean vehicles.

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[14] MPCA, "Greenhouse gas emissions in Minnesota 2005-2022," at page 7. (Jan 2025)
[15] MPCA, "Minnesota Greenhouse Gas Inventory" data visualization tool, under "Sources of emissions 2022" tab. Summed amount under light-duty trucks, heavy-duty trucks, and passenger cars.
[16] Minnesota Public Radio, "As electric vehicles surge on Minnesota roads, a policy U-turn from Trump looms." (April 2025)
[17] Minnesota Department of Transportation, "2022 Statewide Multimodal Transportation Plan" at page 275, Table I-3.
[18] *See* Union of Concerned Scientists, "Rolling Back Vehicle Standards Is Bad for Drivers, the Auto Industry, and Anything that Breathes." (Jan 2021), alongside their factsheet "Electric Vehicle Benefits for Minnesota" (Aug 2024).
[19] Minnesota Department of Health (MDH), "Asthma in Minnesota" webpage, scroll to "Asthma in Metro ZIP Codes" and enter 55411 to see results. Accessed Sept 2025.

This pollution is not just from cars and pick-ups. Diesel-powered school buses expose children from kindergarten to 12th grade to health-harming diesel exhaust, Monday to Friday, alongside bus drivers and school employees. It is even worse for students of color and under-resourced or "low income" students who are already disproportionately exposed to high levels of air pollution due to increased likelihood of living near high traffic corridors or other sources of emissions that increase their exposure to risky levels of air pollution.[20]

EPA's proposed reconsideration of the endangerment finding and plan to roll back greenhouse gas emission standards for heavy-duty vehicles like school buses will lead to market uncertainty. It is because of EPA's past strong tailpipe standards that cleaner school buses reached the market, as the heavy-duty vehicle industry began to clean up its diesel models over the last decade and began offering alternative fuels, including electric school buses, which do not have tailpipes.[21]

Repealing the greenhouse gas standards would make achieving our state's climate goals difficult if not impossible, alongside the resulting detrimental impacts to public health. **For these reasons, we urge that the proposal to repeal the greenhouse gas standards from our federal vehicle emissions standard be rejected and the current standards to remain in place**.

MINNESOTA TRANSPORTATION – EFFICIENCY & AFFORDABILITY

Regulations are often required to spur innovation that manufacturers would not have otherwise that improve products and ultimately save consumers money. The power of stringent federal vehicle emission standards in this regard are well documented.[22] Undercutting these standards will mean consumers in Minnesota and elsewhere contending with higher costs, at a time when other federal actions like the passage of the July 4, 2025 federal reconciliation bill is already slated to cause a rise in transportation costs, electricity costs, and loss of clean energy jobs. An analysis by Energy Innovation on impacts to Minnesota found that the new federal law, coupled with other attempts by the current administration to undercut progress on clean vehicles, will increase annual energy bills (including transportation fuels) by $560 million across Minnesota, while costing Minnesotan 14,400 jobs in 2030 that would have materialized without these recent changes.[23]

An analysis by the U.S. Energy Information Administration projects that under the Trump administration's full package of policies for motor vehicles, American families will pay 76 cents

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[20] MPCA, "Environmental Justice" webpage, scroll to "Better data leads to better results" and chart. Accessed Sept 2025.
[21] U.S. EPA, "Proposed Rules for Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles—Phase 3" notice, at page 4. (April 2023)
[22] Union of Concerned Scientists, "Rolling Back Vehicle Standards Is Bad for Drivers, the Auto Industry, and Anything that Breathes." (Jan 2021)
[23] Energy Innovation, "Assessing Impacts of "One Big Beautiful Bill Act" on Minnesota's Energy Costs, Jobs, Health, and Emissions," (June 2025)

per gallon more at the pump by 2050 than they would if the Biden administration's policies remain in place.[24]

These rising costs would be countered by keeping in place the current federal vehicle emissions standards, which promote increasingly fuel efficient and zero-emissions vehicles, which cost less to operate and maintain than a gasoline or diesel-equivalent, benefits which accrue most to drivers that drive longer distances, like rural Minnesotans.[25] Such standards also ensure that used vehicles – which comprise about 75% of all passenger vehicle and light truck sales in a given year in the U.S.[26] and are typically more affordable to purchase than a new vehicle for most Americans and Minnesotans – continue to increase in fuel efficiency that translates to cost savings for consumers.

It is clear that beyond the stark impacts on Minnesotans' from a worsening climate and resulting harms to public health, there will be an additional hit to Minnesotans' pocketbooks should this proposal from the EPA go forward.

CONCLUSION

The Coalition for Clean Transportation reiterates what it has shown to be true throughout this public comment – that revoking the 2009 Endangerment Finding and removing greenhouse gas standards from federal vehicle emission standards will remove the best tool we have in Minnesota and the U.S. for rapidly reducing climate pollution from the transportation sector, resulting in worsening climate impacts, harm to human health, and costs to Minnesotans. **For these reasons, we urge that the proposal to repeal the greenhouse gas standards from our federal vehicle emissions standard be rejected and the current standards to remain in place**.

Sincerely,

The Coalition for Clean Transportation:
The Alliance
CURE
Fresh Energy
Health Professionals for a Healthy Climate
MN350
Sierra Club North Star Chapter

[24] CBS News, "Repealing rule to curb greenhouse gas emissions will increase gas prices, Trump administration's own analysis finds," (Aug 2025). See first chart, which uses information from the US Energy Information Administration to project that in 2050, the rollbacks and other actions would result in gas prices that are $0.76 higher than what would have occurred if Biden-era policies were kept in place.
[25] Union of Concerned Scientists, "Electric Vehicle Benefits for Minnesota" (Aug 2024)
[26] Consumer Affairs, "Used car statistics" webpage (updated July 2024).