Protect PT

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9/19/2025

United States Environmental Protection Agency (EPA)
1200 Pennsylvania Ave NW
Washington, DC 20004

Re: Proposed Rule: Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards

To U.S. EPA Administrator Lee Zeldin,

Please accept this comment on behalf of Protect Penn-Trafford (PT) and our 235 members. Protect PT is a Pennsylvania nonprofit dedicated to ensuring the safety, security, and quality of life from the effects of unconventional gas development for residents in Westmoreland and Allegheny Counties. Founded by concerned parents living in the shale gas fields, our organization seeks to defend the health of Pennsylvania residents, conserve water resources, reduce pollution, and educate and empower our community members. In order for Pennsylvanians to thrive for generations to come, industry needs to operate responsibly, which is why the EPA's strong regulatory authority to safeguard our water, air, land, and climate is so important.

Protect PT's Environmental Policy Advocate can be reached at (412) 307-7099 and lauren@protectpt.org. Our business address is 3344 Route 130, PO Box 137, Harrison City, PA 15636. This comment addresses the EPA's Proposed Reconsideration of the 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards.

1. We need to update our laws as our scientific knowledge develops.

The EPA 2009 Endangerment Finding was a necessary update to the Clean Air Act that enabled us to more effectively and accurately fulfill the goal of protecting public health and welfare. On April 2, 2007, in *Massachusetts v. EPA*, the Supreme Court found that greenhouse gases are air pollutants covered by the Clean Air Act. The Court held that the EPA Administrator must determine whether or not emissions of greenhouse gases from new motor vehicles contribute to air pollution that endangers public health, or whether the science is too uncertain to make a reasoned decision. The science was clear.

Our organization is based in southwestern Pennsylvania, roughly 30 miles from Donora, PA, where industrial pollution resulted in the historic "Killer Fog"incident of October 1948. That incident took the lives of 20 people, sickened over 6,000, and helped spur the creation of the

Clean Air Act in 1963.[1] We were just beginning to understand the impacts of environmental pollution on human health and wellbeing at the time of the Act's creation. Since then, a vast body of scientific research has improved our understanding of the existence, identity, and impacts of air pollutants. In order to fulfill the purpose of protecting public health and the environment, the CAA must be based on rigorous and current scientific research regarding airborne pollutants. Anything else is a failure of governance to act in the best interests of the populace.

Some of the earliest research to identify carbon dioxide and other greenhouse gasses (GHGs) as pollutants that threatened the human environment was conducted by fossil fuel companies, beginning in the 1950's.[2] As early as 1959, scientists working for the American Petroleum Institute (API) were presenting evidence at industry gatherings about the dangers of elevated atmospheric carbon dioxide levels. They pointed out that although "carbon dioxide is invisible, it is transparent, you can't smell it, [and] it is not dangerous to health," that "this chemical contamination is more serious than most people tend to believe."[3] These early studies concluded that increases in atmospheric CO_2 concentration could significantly impact human civilization.

As responsible corporate actors, these companies continued investigations into the impacts of GHG emissions in subsequent decades. The research confirmed and built upon the understanding of CO_2 as an airborne pollutant with a potent impact on human communities. For example, a 1968 report prepared for the API, "Sources, Abundance, and Fate of Gaseous Atmosphere Pollutants" concluded that carbon dioxide "has been proven to be of global importance to man's environment on the basis of a long period of scientific investigation."[4] By 1977, research had furthered the connection between carbon dioxide and atmospheric changes. Company scientists were reporting to industry leaders that "there is general scientific agreement that the most likely manner in which mankind is influencing the global climate is through carbon dioxide release."[5]

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[1] U.S. EPA. "Plain English Guide to the Clean Air Act" (2007). www.epa.gov/sites/default/files/2015-08/documents/peg.pdf

[2] Oliver Milman. "'Smoking gun proof': fossil fuel industry knew of climate danger as early as 1954, documents show," *The Guardian* (2024). www.theguardian.com/us-news/2024/jan/30/fossil-fuel-industry-air-pollution-fund-research-caltech-climate-change-denial

[3] Planetary Health for Busy People. "Edward Teller's 'Energy Patterns of the Future' (1959) Presentation" (2023). www.planetaryhealthforbusypeople.com/whats-now-and-whats-new/edward-teller

[4] E. Robinson and R.C. Robbins. "Sources, Abundance, and Fate of Gaseous Atmospheric Pollutants (Prepared for the American Petroleum Institute)," *Stanford Research Institute* (1968).

[5]Shannon Hall. "Exxon Knew about Climate Change almost 40 years ago," *Scientific American* (2015). https://www.scientificamerican.com/article/exxon-knew-about-climate-change-almost-40-years-ago/

Since those early days of investigation, steady research by hundreds of scientists around the world have addressed the uncertainties identified by these formative studies. They have conducted systematic and replicable studies, and reached widely reviewed and accepted conclusions about GHGs as an environmental pollutant. These studies describe how GHGs function in our environment, including: the trends in GHG concentrations, the origins and fate of GHG emissions, and the mechanisms by which GHGs influence the environment.[6] They have also elaborated on how CO_2 and other GHG emissions destabilize the climate, and impact human health, the environment and the economy. This vast body of peer reviewed research reveals the far-reaching damaging effects of these pollutants, if left unmanaged. This work has been conducted by public and private institutions. Much of this work was government funded, since a better understanding of the issue is a matter of public interest.

The Endangerment Finding represented a much needed modernization of the CAA that incorporated over 60 years of scientific investigation into the role of CO_2 and GHGs as environmental pollutants. Without incorporating the overwhelming current scientific consensus on CO_2 and GHG emissions as potent pollutants into its framework, the CAA would be based on pre-1950's science, a science which had a fledgling understanding of atmospheric processes and pollutants. Not recognizing CO_2 and GHG emissions as pollutants that require management would deprive the public of the benefit of over six decades of research, including research that was paid for with public tax dollars. Rejecting the classification of CO_2 as a critical and potent pollutant would ignore lessons we have learned about how to protect an *essential* component of a healthy and prosperous human environment: a stable and predictable climate. It means that our communities, technologies and economies will be based on a false premise of what is needed to succeed and prosper, damaging the ability of our country and our citizens to have a place in the future, just as the "killer fog" of 1948 did for the unfortunate victims of Donora.

It is also valuable to note that as our understanding of air pollutants has increased in its scope and complexity, we have regulated other gases and chemicals and substances because of their harmful impact on things like stratospheric ozone, acid rain, and visibility — all of which are not direct health impacts and come from many sources that all contribute a little to the problem. One example is chlorofluorocarbons (CFCs), which were used as propellants in aerosol hairspray and damaged the ozone layer by releasing chlorine and bromine atoms in the upper atmosphere that destroy ozone molecules.[7] CFCs were believed to be stable and safe, but

[6] IPCC. "Climate Change 2021: The Physical Science Basis," *Sixth Assessment Report* (2021). https://www.ipcc.ch/report/ar6/wg1/

[7] Sara LaJeunesse. "Probing question: What ever happened to the ozone hole?," *Penn State* (2010). https://www.psu.edu/news/research/story/probing-question-what-ever-happened-ozone-hole

once we discovered otherwise, we banned CFCs to protect the ozone layer. The "hole" in our ozone layer is still there, but thanks to strong international cooperation, it has not grown.[8]

2. The Endangerment Finding was based on sound science that has only increased in validity.

A comprehensive review of the contemporary state of scientific knowledge regarding CO_2, GHGs, and their role in climate forcing informed EPA's 2009 Endangerment Finding. Since then, the Finding has been strengthened by rigorous scientific studies whose conclusions have reinforced the rationale of recognizing CO_2 and GHGs as pollutants with significant impact to human health and the environment. At this point in history, there is expert consensus on the following points:

- Human caused CO_2 and other GHG emissions to the atmosphere are causing measurable and significant increases in global temperature.[9]
- The burning of fossil fuels is a major source of GHGs to the atmosphere.[10]
- Vehicular emissions are a measurable and significant sectoral contributor to GHG emissions.[11]
- Alterations in the global atmospheric concentration of GHGs results in demonstrable threats to the survival of human communities.[12]

There are no existing, credible, alternative explanations for the systematic, global climate changes that have been observed. Many avenues of study have been pursued to reach the current consensus. These investigations carefully explored and evaluated possible alternative interpretations of the climate record and the causes of trends in that record, because the scientific method demands that no conclusion is valid until evidence rules out other options.[13] Decades of research now convincingly demonstrate that any explanation which downplays, omits, or denies the primary role that human caused GHG emissions play in climate forcing

[8] *Id.* at 7.
[9] John Cook, et al. "Consensus on consensus: a synthesis of consensus estimates on human-caused global warming," *Environmental Research Letters* 11, no. 4 (2016). https://iopscience.iop.org/article/10.1088/1748-9326/11/4/048002
[10] R.J. Andres et al. "A synthesis of carbon dioxide emissions from fossil-fuel combustion," *Biogeosciences* 9 (2012): 1845-187, https://bg.copernicus.org/articles/9/1845/2012/bg-9-1845-2012.pdf
[11] Congressional Budget Office. "Emissions of Carbon Dioxide in the Transportation Sector" (2022). https://www.cbo.gov/system/files/2022-12/58566-co2-emissions-transportation.pdf
[12] IPCC. "Climate Change 2021: The Physical Science Basis," *Sixth Assessment Report* (2021).
[13] William W. Kellogg. "Response to Skeptics of Global Warming," *Bulletin of the American Meteorological Society* 72, issue 4 (1991): 499-512, https://doi.org/10.1175/1520-0477(1991)072%3C0499:RTSOGW%3E2.0.CO;2

does not stand up to scrutiny.[14] This research also confirms the serious threat that GHG-caused climate forcing poses to human health and survival.

Since the 1960s, studies have continually and credibly dismissed alternative explanations and interpretations. They have done this in a public forum, subject to scrutiny by a large body of peer experts. This is in contrast to the recently released DOE study from July, 2025.[15] This study was conducted without peer review by a small group of authors. The selection of this Climate Working Group was done behind closed doors, out of the public eye, and without input from the large body of experts who have been evaluating research into this subject for decades. A review of the July 2025 CWG report by a body of peers has already identified numerous errors, omissions, misrepresentations and faulty conclusions.[16] The DOE report disingenuously suggests that the existing body of research has not responded to, and convincingly dismissed, the characterization of CO_2 and GHGs as innocuous. It falsely suggests that there is widespread disagreement among experts on the identity of CO_2 and GHGs as potent pollutants with impacts to human health, environments, and public welfare.

Basing repeal of the Endangerment Finding on the DOE report, or any other reports which contradict the overwhelming consensus of the vast majority of experts in the field over the last 60 years, would be arbitrary and capricious. Science is never "settled", because it is inherently structured to dig deeper and encourage further discovery. While researchers are still debating finer scale details of the role and impacts of elevated GHG emissions in the atmosphere, the foundational understanding of CO_2 and GHG pollution necessary to take action and protect the American public is strong.

3. There are widespread negative health impacts of increased CO_2 and related greenhouse gases in our atmosphere.

Building upon the foundational understanding that CO_2 and other GHG emissions from human activities are driving changes to the global climate, we find that it is equally well-established that these changes will result in tangible consequences in the form of extreme weather events, natural disasters, and other environmental anomalies that threaten human health.
These harms manifest in multiple, interconnected ways: more frequent and severe heat waves that cause illness and death, declining food and water security, worsening air quality that drives

[14] IPCC. "AR26 Synthesis Report: Climate Change 2023," *Sixth Assessment Report* (2023). https://www.ipcc.ch/report/ar6/syr/
[15] U.S. Department of Energy. "A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate" (2025). https://www.energy.gov/sites/default/files/2025-07/DOE_Critical_Review_of_Impacts_of_GHG_Emissions_on_the_US_Climate_July_2025.pdf
[16] Andrew Dressler and Robert Kopp. "Climate Experts' Review of the DOE Climate Working Group Report," *ESS Open Archive* (2025). https://doi.org/10.22541/essoar.175745244.41950365/v1

respiratory and cardiovascular disease, and the spread of infectious disease vectors into new regions; not to mention the direct physiological risks from elevated GHG concentrations and increased risks to public safety from GHG-related infrastructure that would occur as a result of lax regulation under a repealed Endangerment Finding. Repealing the Endangerment Finding would undoubtedly lead to an increase in carbon dioxide and other GHG emissions and exacerbation of climate change, thus exposing communities to heightened health risks and even increased deaths.

Extreme Heat Events

One of the most immediate and fatal consequences of an increase in atmospheric GHGs is a higher frequency of extreme heat events. Heat-related deaths in the United States more than doubled between 1999 and 2023, with rates increasing even more substantially within the past seven years.[17] Certain populations are at greater risk of heat-related health complications, such as the elderly, agricultural and construction workers, and those without access to air conditioning or reliable housing. Individuals with pre-existing medical conditions are especially vulnerable as well; for example, those with cardiovascular disease, renal issues (e.g. kidney disease), or fainting syndromes such as postural orthostatic tachycardia syndrome (POTS) face greater risks of hospitalization or, in some cases, premature death during extreme heat.

For the unhoused, extreme heat events are even more likely to be fatal. Studies have shown that unhoused populations are 200 to 300 times more likely to die from heat exposure than the general population.[18] Many rely on bottled water donations or public fountains, which can be hard to access or inaccessible entirely during extreme weather. Even for low-income households, rising temperatures increase reliance on air conditioning–driving up electricity bills and forcing trade-offs between cooling, water, and other essentials. Households already burdened by water shutoffs or unsafe private wells, as many in Pennsylvania have experienced at the hands of the oil and gas industry, are left especially vulnerable. Climate-driven droughts compound this crisis. In regions already facing water scarcity, continued heat waves will deplete local supplies faster, placing stress on municipal water systems.

Rising temperatures and changing precipitation patterns also increase the risk of harmful algal blooms in lakes and rivers, biologically contaminating drinking water and threatening human and animal health; for example, in Lake Erie, where harmful algal blooms pose a now annual

[17] Jeffrey Howard, et al. "Trends of Heat-Related Deaths in the US, 1999-2023," *JAMA Network Open* 332, no. 14 (2024): 1203-1204, https://doi.org/10.1001/jama.2024.16386
[18] Ramin, Brodie, and Tomislav Svoboda. "Health of the homeless and climate change." *Journal of urban health : bulletin of the New York Academy of Medicine* vol. 86,4 (2009): 654-64. https://doi.org/10.1007/s11524-009-9354-7

threat to nearly 11 million people whose drinking water depends on it.[19] Contamination, coupled with the threat of droughts, will create a scenario where access to clean water is increasingly precarious. Without proactive climate policy, millions of Americans—especially those already facing systemic inequities—will struggle to secure clean water, adequate hydration, and protection from the escalating risks of heat-related illness and death.

Natural Disasters

At the opposite end of the spectrum, climate change has proven to impact precipitation patterns in a manner that can also lead to more frequent and severe flooding events. Floods not only result in acute injuries, drownings, and deaths, but also leave long-term health burdens from mold exposure, contaminated drinking water, and displacement-related mental health crises.[20] Similarly, landslides and the related infrastructure damage that comes with them are also an ever-increasing threat as climate change progresses and precipitation patterns are altered. Landslides are common in Pennsylvania, with our region of Southwestern PA experiencing the highest concentration of landslides compared to anywhere else in the state.[21] Already considered a 'high susceptibility' area, landslide risk in our region will only continue to grow as climate change worsens. While primarily an economic concern, landslides and other storm-induced debris flows can cause injury or death. Furthermore, for already vulnerable populations such as low-income households, individuals with disabilities, and the elderly, access to food, water, and other necessities in the aftermath of a landslide emergency may be scarce.

Similarly, hurricanes and storm surges are growing more intense as a result of climate change, devastating coastal communities, overwhelming emergency response systems, and leaving behind public health crises that can last years. For example, in the aftermath of Hurricane Katrina in 2005, displaced New Orleans residents experienced long-term mental health challenges—including elevated rates of post-traumatic stress disorder, depression, and anxiety—that have persisted since the event.[22] These disasters especially endanger the lives of individuals with mobility challenges, low-income families living in flood-prone housing, and communities of color who are historically situated in high-risk areas due to discriminatory planning tactics.

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[19] Anna M Michalak, et al. "Record-setting algal bloom in Lake Erie caused by agricultural and meteorological trends consistent with expected future conditions." *Proceedings of the National Academy of Sciences of the United States of America* vol. 110,16 (2013): 6448-52. https://doi.org/10.1073/pnas.1216006110

[20] David L Paterson, Hugh Wright, Patrick N A Harris. "Health Risks of Flood Disasters," *Clinical Infectious Diseases*, vol. 67, issue 9 (2018): 1450–1454. https://doi.org/10.1093/cid/ciy227

[21] Commonwealth of Pennsylvania, Department of Conservation and Natural Resources. "Landslides" (2025) https://www.pa.gov/agencies/dcnr/conservation/geology/geologic-hazards/landslides

[22] Ronald C Kessler et al. "Mental illness and suicidality after Hurricane Katrina." *Bulletin of the World Health Organization* vol. 84,12 (2006): 930-9. https://doi.org/10.2471/blt.06.033019

It is also important to remember how fatal these extreme events can become, and how their prevalence will only increase with the rise of atmospheric CO2 and related GHGs. Approximately 568 direct and indirect fatalities resulted from the 27 weather and climate disasters (including wildfires, floods, storms, severe drought events, etc.) with at least $1 billion in damages that occurred last year, up significantly from the 302 deaths per year from these events, on average, that were seen back in the 1980s.[23]

Air Quality

Rising GHGs in the atmosphere also worsen air quality through multiple mechanisms. Higher temperatures will accelerate the chemical reactions in the air that form ground-level ozone and particulate matter ($PM_{2.5}$). Climate-driven droughts and wildfires can also drive the formation of $PM_{2.5}$. Both pollutants are directly linked to asthma, cardiovascular events, stroke, and premature death. While both of these pollutants would still be regulated under the National Ambient Air Quality Standards (NAAQS) even with the slated repeal of the Endangerment Finding, climate change is going to make it significantly harder for places like Allegheny County, PA, which has struggled to reach attainment of healthy air quality standards and levels of regulated pollutants like ozone.

In Pennsylvania, steel industry activities—like processing coal into coke—already contribute significantly to high VOC and particulate matter levels and thus the formation of ground-level ozone. These climate-driven increases will only exacerbate existing health burdens, of which children bear a disproportionate share of the risks. Children are especially vulnerable to air pollution due to the fact that they breathe more air per unit of body weight than adults and generally spend more time outdoors during peak risk hours. Childhood asthma prevalence in the United States has climbed to nearly 1 in 14 children, making it one of the most common chronic diseases experienced during childhood.[24] In Southwestern PA specifically, a peer-reviewed study conducted by Dr. Deborah A. Gentile shows children in Allegheny County living near major pollution sources had nearly triple the prevalence of asthma (22.5%) as compared to the national average (8.5%).[25] Exposure to ground-level ozone and PM2.5 not only trigger asthma attacks, but also impair lung development, leading to reduced lung function that persists into adulthood.[26] As climate change intensifies ozone formation and

[23] U.S. NOAA National Centers for Environmental Information. "Billion-Dollar Weather and Climate Disasters" (2024). https://www.ncei.noaa.gov/access/billions/
[24] U.S. CDC National Center for Environmental Health. "Most Recent National Asthma Data" (2021). https://www.cdc.gov/asthma/most_recent_national_asthma_data.htm
[25] Deborah A. Gentile et al. "Asthma Prevalence and Control among Schoolchildren Residing near Outdoor Air Pollution Sites," *Journal of Asthma* (2020). https://doi.org/10.1080/02770903.2020.1840584
[26] W. James Gauderman et al. "Association of Improved Air Quality with Lung Development in Children," *The New England Journal of Medicine*, vol. 372, no. 10 (2015): 905-913. https://www.nejm.org/doi/full/10.1056/NEJMoa1414123

wildfire smoke exposure, these burdens will only grow, subscribing a new generation to chronic respiratory disease unless CO_2 emissions and co-pollutants are aggressively reduced.

The American Lung Association projects that transitioning Pennsylvania's industrial heat systems alone to clean technologies by 2050 could prevent 5,760 premature deaths, avoid over two million asthma attacks, and prevent more than 12,000 new asthma cases just in Pennsylvania—demonstrating how a reduction in CO_2 and related pollutants directly improves public health outcomes.[27] However, with this potential reconsideration of the Endangerment Finding, the U.S. would only stray further and further away from this goal.

Disease Risk

Climate change is expanding the geographic range of vector-borne diseases, including those carried by ticks and mosquitoes. Warmer winters and longer summers allow species such as the blacklegged tick—the primary vector of Lyme disease—to spread farther north and remain active longer.[28] Pennsylvania already has among the highest Lyme disease rates in the nation, and further warming is expected to worsen this public health burden across our state. Warmer temperatures and altered precipitation patterns are also creating a wider availability of breeding sites for mosquitos, increasing the risk of tropical diseases such as West Nile virus, dengue, and Zika.[29] Moreover, climate-driven disruptions to ecosystems cause species to shift habitats, resulting in pathogens coming into contact with human populations that haven't been in contact before—an issue underscored by the COVID-19 pandemic.[30]

Children, the elderly, immunocompromised individuals, and outdoor workers face disproportionate risks, particularly in regions already experiencing high rates of tick- and mosquito-borne illness. Without continued recognition of CO_2 and related GHGs as pollutants driving these conditions, public health agencies will be increasingly unprepared to manage the spread of infectious disease.

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[27] American Lung Association. "Clean Heat, Clean Air: Health Benefits of Modern Industrial Technologies" (2025). https://www.lung.org/getmedia/97c8c798-d246-4f1d-9bd1-dbb77447a816/ALA-Clean-Heat-Clean-Air-Report.pdf

[28] Rebecca J Eisen et al. "County-Scale Distribution of Ixodes scapularis and Ixodes pacificus (Acari: Ixodidae) in the Continental United States." *Journal of medical entomology* vol. 53,2 (2016): 349-86. https://doi.org/10.1093/jme/tjv237

[29] Sadie J Ryan et al. "Global expansion and redistribution of *Aedes*-borne virus transmission risk with climate change," *PLOS Neglected Tropical Diseases* 13, 3 (2019). https://doi.org/10.1371/journal.pntd.0007213

[30] Colin J Carlson et al. "Climate change increases cross-species viral transmission risk." *Nature* vol. 607,7919 (2022): 555-562. https://doi.org/10.1038/s41586-022-04788-w

Direct Exposure to High Levels of CO_2

In addition to their role in driving global climate change, CO_2 and related gases pose direct risks to human health and safety when transported or stored at high volumes. Pipeline ruptures and leaks can displace oxygen, trigger explosions, and expose surrounding communities to immediate danger. Pennsylvania has witnessed such a tragedy. In August 2023, a home in the Rustic Ridge neighborhood of Plum Borough, located in Allegheny County, experienced a natural gas leak migration into the basement, which ignited and caused an explosion that killed six people, destroyed three houses, and damaged dozens more. The explosion was found to have been linked to a pipeline leak that was coupled with a pressure build-up in the system, underscoring how failures in gas infrastructure can quickly become catastrophic public health emergencies. A repeal of Endangerment Finding makes way for the subsequent expansion of storage and transport infrastructure for greenhouse gases such as methane and CO2 across the U.S, inviting more incidents of this nature and disproportionately affecting the rural and environmental justice communities on the frontlines of this kind of activity.

Such incidents make clear that the dangers of poorly regulated CO_2 and related GHG facilities extend well beyond climate impacts and emphasize the importance of acknowledging the results of the original Endangerment Finding. Leaks and explosions put entire neighborhoods at risk; meanwhile, emergency services may be rendered inaccessible during such events, as combustion engines cannot be used in oxygen-deprived air, especially due to the explosivity risk of the engines should they be turned on.

These health burdens are not speculative—they are already measurable, increasing, and projected to worsen as emissions rise. Every ton of CO_2 released into the atmosphere increases these risks, and repealing the Endangerment Finding would undoubtedly ensure higher emissions, greater environmental instability, and mounting public health crises. Rolling back these protections is a decision that will inevitably cost lives, strain emergency response systems, increase healthcare costs, and erode the basic conditions necessary for safe and healthy communities.

4. Costly economic impacts will occur as a result of CO_2-driven climate change.

Many economists agree that climate change will cause severe damages and costs to the global economy. A 2021 survey of 738 published economists found overwhelming consensus that the costs of inaction on climate change are higher than the costs of action, and that immediate, aggressive emissions reductions are economically desirable.[31] Respondents expressed striking

[31] Peter Howard and Derek Sylvan. "Gauging Economic Consensus on Climate Change," *Institute for Policy Integrity at the New York University School of Law* (2021). https://policyintegrity.org/publications/detail/gauging-economic-consensus-on-climate-change

levels of concern about climate impacts and predicted major GDP losses and a reduction in long-term economic growth.[32] Furthermore, a 2024 study by economist Maximilian Kotz estimated that climate damage costs by 2050 will be six times larger than the cost of reducing carbon pollution consistent with world's targets under the Paris climate agreement over the same time frame.[33]

Estimates on just how much climate change will cost the world hover in the trillions of dollars, with impacted industries including everything from agriculture and forestry to tourism, real estate, and insurance. Pennsylvania's forestry, agriculture, and dairy industries—all major parts of our state's economy—could be at risk. Drought conditions reduce crop yields and livestock viability, jeopardizing food security both regionally and nationally.[34] For families already living paycheck to paycheck, rising food and water costs will only amplify existing health disparities.

Overall, increases in temperature and natural disasters may diminish worker productivity, disrupt supply chains, damage property, decrease availability of certain natural resources, and result in human conflict due to resource scarcity. Americans' ability to build generational wealth through buying a home may be compromised as more and more homes are destroyed by hurricanes, flash floods, wildfires, and tornados, and as the cost of home insurance rises: average premiums are up 31% since 2019, especially in high-risk climate areas.[35] Homeownership is a foundational part of the American economy, with residential real estate in the United States worth nearly $50 trillion — almost double the size of the entire GDP.[36] It won't just be individuals spending to rebuild after natural disasters either; municipalities, cities, and states will all have to spend more to maintain, repair, or replace vital infrastructure. Here in Western Pennsylvania, our infrastructure is already aging and in great need of replacement, with municipalities facing backlogged or neglected projects and limited funds to do so. The Center for Climate Integrity estimates that Pittsburgh would need $520 million for climate resilience and adaptation by 2040, a sum that is almost as large as the city's entire operating budget for a year.[37]

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[32] *Id* at 31.
[33] Maximilian Kotz et al. "The economic commitment of climate change," *Nature* 628, (2024): 551–557. https://doi.org/10.1038/s41586-024-07219-0
[34] U.S. Department of Agriculture. "Action Plan for Climate Adaptation and Resilience" (2021). https://www.sustainability.gov/pdfs/usda-2021-cap.pdf
[35] Abrahm Lustgarten. "How Climate Change Could Upend the American Dream," *ProPublica* (2025). https://www.propublica.org/article/climate-change-homes-insurance-housing-rent-mortgage
[36] *Id.*
[37] The Center for Climate Integrity. "Pennsylvania's Looming Climate Cost Crisis: The Rising Price to Protect Communities from Heat, Precipitation, and Sea Level Rise" (2023). https://climateintegrity.org/uploads/media/Pennsylvania-ClimateCostStudy-2023.pdf

5. The majority of Americans support climate action.

Across cities, states, and party lines, Americans want clean air and a bright future. A clear majority of Americans are concerned about climate change and actually want corporations to do more to reduce the effects. According to a 2024 Pew Research Center survey of almost 10,000 Americans, 73% feel sad about what is happening to the Earth, and 69% of Americans say large businesses and corporations are doing too little to help reduce the effects of global climate change.[38] Majorities also view state elected officials (60%) and the energy industry (57%) as doing too little on climate.[39] Furthermore, 64% of Americans say that climate policies either help or make no detrimental impact on the U.S.economy.[40] Americans know that thriving industry and climate change mitigation policies can coexist — in fact, they already have.

Climate change is a broadly accepted fact, with action taken by governments, companies, nonprofits, and individuals around the globe. Ignoring the harms of climate change is capricious, and climate change is a direct impact of carbon dioxide (CO_2) emissions. Regulating CO_2 and the blend of greenhouse gases that contribute to climate change is vital. Nothing exists in isolation – cumulative impacts and indirect health effects are important to consider for environmental and public health protection. Further, a healthy, stable atmosphere and climate is essential for human health and prosperity.

In conclusion, EPA Administrator Lee Zeldin's proposal to repeal the Endangerment Finding is a disappointing and dangerous step back for frontline communities like those in the shale fields of Pennsylvania. It is an unpopular action that clearly panders to large corporate interests and puts fringe ideology above scientific consensus that has been affirmed time and time again. Our residents are tired of seeing our government cater to these special interests while industrial pollution continually harms them and their families. Removing the EPA's ability to regulate greenhouse gas emissions will only undermine existing progress to improve industrial efficiency, adapt our economy, protect public health, and mitigate the wide-ranging and severe effects of climate change. As the rest of the world moves forward, America will lag behind, choosing to regress and stagnate instead of forging a better future. For the sake of our nation, we urge the EPA not to repeal the Endangerment Finding.

Sincerely,

[38] Pew Research Center. "How Americans View Climate Change and Policies to Address the Issue" (2024). www.pewresearch.org/science/2024/12/09/how-americans-view-climate-change-and-policies-to-address-the-issue/
[39] *Id.*
[40] *Id.*

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