



EPA Region 10 Tribal Operations Committee (RTOC)
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September 22, 2025

Honorable Lee M. Zeldin, Administrator
Environmental Protection Agency
Mail Code 1101A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Submitted via www.regulations.gov

**RE: Reconsideration of 2009 Endangerment Finding and Greenhouse Gas
Vehicle Standards Docket No. EPA-HQ-OAR-2025-0194**

Dear Administrator Zeldin:

This letter is sent on behalf of the Tribal Caucus members of EPA Region 10's Tribal Operations Committee ("RTOC"). This letter is not sent on behalf of EPA Region 10 or any employees of EPA, but solely tribal government representatives of the RTOC. This letter in response to the U.S. Environmental Protection Agency's (EPA) Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards Docket No. EPA-HQ-OAR-2025-0194.

First, the RTOC strongly believes that EPA must engage in consultation on a government-to-government basis with tribal governments to fully understand the impact of the proposed changes to the Clean Air Act's regulations on tribal communities and tribal resources. Webinars, comment letter, and phone calls are not consultation. EPA officials must meet face-to-face with tribal elected officials to comply with their obligations to consult.

Second, our review of this proposal raises substantial concerns. The proposed actions to deregulate emissions of greenhouse gases would be a change in our nation's climate change policies in the wrong direction. Air pollution from motor vehicles has long been known to adversely affect our health. We now know that tailpipe emissions are a major source of greenhouse gases. Tribes in Region 10 are already experiencing the consequences of climate change, which is caused in significant part by GHG emissions from motor vehicles and power plants in the U.S. Rising temperatures, heavier rainfall, and more frequent extreme events are

straining public infrastructure and increasing costs for local governments. These impacts include:

- **Extreme heat:** Higher summer temperatures and longer heat waves increase heat-related illness, raise utility bills for cooling, increase the risk of electricity service outages, and put vulnerable populations such as elders.
- **Air quality:** Hotter summers and increased vehicle emissions worsen smog and particulate pollution, exacerbating asthma and other respiratory conditions, especially in children.
- **Flooding and stormwater:** More intense rain events overwhelm stormwater systems and impact the health of our rivers and streams.
- **Infrastructure costs:** Roads, bridges, drinking water systems, and power infrastructure were not built for these conditions, creating costly repairs and premature replacement needs.
- **Disproportionate impacts:** Tribes often bear the greatest burdens, facing higher exposure to flood risks, urban heat, and traffic-related pollution while having fewer resources to adapt.

EPA's 2009 Endangerment Finding rested on an extensive body of peer-reviewed science, which has only grown stronger in the years since. The Fifth National Climate Assessment, published in 2023, confirms that climate change is already harming U.S. cities and their residents, finding that "Cities are experiencing increased risks from climate hazards, including extreme heat, flooding, sea level rise, drought, and wildfires"¹ and that "Infrastructure designed for past climate conditions is increasingly vulnerable, leading to rising costs for municipalities and residents."²

Transportation is the largest source of greenhouse gas emissions in the United States, accounting for 28 percent of total emissions in 2022 according to EPA data.³ EPA repeal of existing GHG standards for new motor vehicles will not empower Tribal governments; it would leave Tribes virtually powerless to regulate transportation-related emissions, despite bearing the costs of their impacts.

The costs to Tribe and the resources to which they depend on must be considered in this process. EPA's Regulatory Impact Analysis considers only the economic benefits of the proposed actions to selected businesses. It fails to consider the real costs to Tribal health and welfare that will occur from this proposal, including the loss of progress in benefits from future regulations to reduce emissions of GHGs.

The RTOC urges EPA to withdraw this proposal and retain the Endangerment Finding and federal vehicle GHG standards in their current form. Protecting the health and welfare of our residents requires continued recognition of the dangers posed by GHG emissions and decisive

¹ NCA5, *Cities and the Built Environment*, Key Message 1, at 1842.

² *Id.*

³ U.S. EPA, *Inventory of U.S. Greenhouse Gas Emissions and Sinks* (July 1, 2025), <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks>.

action to mitigate them. The RTOC appreciates your consideration of these comments and specifically requests that EPA provide an update on this proposal at one of its meetings.

Sincerely,

Raymond E. Paddock III
Central Council of the Tlingit and Haida Indian Tribes of Alaska
Region 10 Tribal RTOC Chair