



September 22nd, 2025

Lee Zeldin, Administrator
U.S. Environmental Protection Agency
William J. Clinton Building
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Comments on EPA’s proposed rule to “Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units” (Docket ID: EPA-HQ-OAR2025-0124)

The Association for Commuter Transportation opposes the EPA’s proposal to repeal greenhouse gas (GHG) emission standards for light, medium, and heavy-duty vehicles and to rescind the 2009 Endangerment Finding under the Clean Air Act. Maintaining strong GHG standards is essential to ensuring safe air quality across the country from transportation-related pollution.

Transportation Demand Management (TDM) is a commonsense transportation solution that leads to better outcomes for all - including improved air quality. TDM’s goals of easing traffic congestion, maximizing transportation efficiency, and minimizing the wear and tear on our roadways, are inextricably linked with the lowering of greenhouse gas emissions and improved air quality. This leads to happier and healthier communities and families.

Rolling back GHG standards would undermine both public health protections and the economic benefits of TDM. Less congested transportation networks improve access to jobs and economic centers while reducing costs associated with roadway maintenance and lost productivity from traffic. Removing these standards would reverse progress, increase pollution, and weaken the foundation for sustainable economic growth.

ACT urges the EPA to maintain GHG emission standards to safeguard public health, support efficient transportation systems, and strengthen economic opportunity nationwide.