

RE: Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards

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

Submitted electronically to <https://www.regulations.gov>

Dear Administrator Zeldin,

The Electric Drive Transportation Association (EDTA) is the cross-industry trade association promoting the advancement of electric drive technology and electrified transportation. EDTA's members represent the entire value chain of electric drive, including vehicle, battery and component manufacturers, electric utilities, fleets, and infrastructure developers. Collectively, we are committed to realizing the economic, national security, health and environmental benefits of hybrid, plug-in hybrid, battery, and fuel cell electric vehicles. The technology portfolio is a key asset in achieving the Administration's goals for U.S. energy dominance.

Electrification is this century's great technology race and U.S. leadership in this global contest will yield benefits for drivers, for the environment and public health, and for the nation as a whole. It is in this context that we focus on our comments on the importance of vehicle emissions standards. (C-13).

It has been comprehensively documented that vehicle emissions are detrimental to public health and the environment, findings recently reaffirmed by the National Academy of Sciences, Engineering, and Medicine.¹ Electric transportation technologies provide a scalable technical solution that can reduce emissions across the U.S. fleet of consumer and commercial vehicles.

With more than seven million light duty electric vehicles currently on the road today and over 180 models for consumers to choose, this young market demonstrates the potential for advancing next generation transportation options in the United States.²

U.S. leadership in next-generation transportation technology creates more vehicle choices for consumers while ensuring our economic and energy security. Since 2016, over \$580 billion in investments in the electric transportation supply chain have been announced. There is \$355 billion in allocated electric transportation investment in the United States, investment reinforced by policy signals that provided certainty to investors, manufacturers, and consumers. Loss of these market signals creates an opportunity for our international competitors, especially China.

Expanding vehicle choices for consumers makes our economy more resilient by insulating it from global energy price volatility. It also facilitates the next generation of autonomous vehicles, which can make U.S. transportation more efficient and potentially safer.

Federal policy should be accelerating technological development and supporting market growth as part of a national effort to build a stronger, more prosperous America. Credible and feasible efficiency and emissions

¹ NAS [Effects of Human-Caused Greenhouse Gas Emissions on U.S. Climate, Health, and Welfare | The National Academies Press](#)

² [EV Market Dashboard – Atlas EV Hub](#)

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regulations, ensuring that manufacturers have the certainty they need to invest in the development and production of next generation transportation technologies, have an important role to play in that framework.

The actions proposed in this rulemaking will have far-reaching impacts in the market and in U.S. innovation and manufacturing, with potential negative impacts on public health, the environment, and consumer choice. They also create the potential for a patchwork approach to regulation in the states.

EDTA supports the Administration's goals for U.S. energy dominance and growing domestic industries. We urge the Agency to advance a regulatory framework for feasible transportation emissions and efficiency that recognizes the vital importance of US innovation and provides consumers access to the myriad benefits of electrification.

At minimum, the timeline for comments and consideration of these proposals should be extended to reflect the magnitude of their implications.

Thank you for your consideration.