Public Comment on EPA-HQ-OAR-2025-0194-0093, Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards

By Bill Menke

[The federal government routinely solicits public comments as part of the process of creating or revising federal regulations. The intent of this rule change is repeal greenhouse gas emission standards for vehicles].

Retention of 2009 Endangerment Finding warranted by geologic evidence of CO2's role in climate change and probable harm to America by sea level rise.

Geological evidence very strongly proves that CO2 was low during the Earth's cold periods (e.g. one million years ago) and high during its warm periods (e.g. 50 million years ago) (1). Furthermore, this correlation is proved by basic thermal physics (2) to be a consequence of CO2 affecting the heat balance of the atmosphere. Rising levels of CO2 in historic times are well-explained by our use of fossil fuels, which releases CO2 fumes as a byproduct of combustion (3). Consequently, the case is very strong that global temperatures will continue to rise if we continue to burn fossil fuels. Rising global temperatures (4) have many proven negative effects, including increased frequency of forest fires (5), increased extremes of oppressive summer heat (6), northward migration of tropical diseases (7) and sea level rise (8). Sea level rise due to melting glaciers is arguably the hardest type of damage to mitigate (9), because of the impracticality of protecting buildings that are below sea level. At current rates of fossil fuel burning, we will reach the CO2 level at which, in the past, Antarctica was unglaciated and sea level was 200 feet higher (10), by about the year 2140 and much sooner if fossil fuel use expands (11). Then, a steady yearly rise in sea level by a few inches a year (12) and continuing for hundreds of years will occur. Consequently, it is in the best interest of America to regulate CO2 emissions so that sea level rise and other dangerous climate-related impacts are reduced.

William Menke, US Citizen residing in Tappan, New York, MIT graduate and PhD in geophysics.

[Note: Citations were omitted from the submitted version].

(1) The Cenozoic CO2 Proxy Integration Project (CenCO2PIP) Consortium, Toward a Cenozoic history of atmospheric CO2, Science 382, 2023.

(2) Heat stored in the Earth system 1960–2020: where does the energy go? Earth System Science Data 15, 1675–1709, 2023

(3) Friedlingstein, P, et al., Global Carbon Budget 2024, Earth System Science Data 17, 965–1039, 2025.

(4) National Aeronautics and Space Administration, Global Temperature, climate.nasa.gov/vital-signs/global-temperature

(5) Zhao, J, et al., Global warming amplifies wildfire health burden and reshapes inequality, Nature, 2025.

(6) Titley, DW, et al., Attribution of Extreme Weather Events in the Context of Climate Change, Section 4, The National Academies Press, 2016.

(7) Ainsworth, C., Tropical diseases move north, Nature, 2023.

(8) Sweet, WV, et al., Patterns and projections of high tide flooding along the U.S. coastline using a common impact threshold, OAA Technical Report NOS CO-OPS 086, 2018.

(9) Minunno, R., A systematic literature review considering the implementation of planetary geoengineering techniques for the mitigation of sea-level rise, Earth-Science Reviews 241, 2023.

(10) Miller, K, et al., A 180-million-year record of sea level and ice volume variations from continental margin and deep-sea isotopic records, Oceanography 24, 2011.

(11) Alcamo, J, et al., Special Report on Emissions Scenarios, Intergovernmental Panel on Climate Change, 2000.

(12) Stokes, CR, et al., Warming of +1.5 °C is too high for polar ice sheets, Communications Earth & Environment volume 6, 2025.