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September 22, 2025

The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

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

Dear Administrator Zeldin,

On behalf of the Specialty Equipment Market Association (SEMA), it is my pleasure to present comments on the U.S. Environmental Protection Agency's (EPA) proposed rulemaking to reconsider and repeal the 2009 Endangerment Finding and associated greenhouse gas (GHG) vehicle standards.

SEMA and its 7,000 member businesses are the heart of the U.S. automotive aftermarket industry, which annually contributes more than \$337 billion to the U.S. economy and supports more than 1.3 million American jobs. Most of the businesses that make up the aftermarket are small businesses, but there is nothing small about the innovation and ingenuity they show every day. The products that aftermarket businesses manufacture, sell, and distribute to automotive enthusiasts worldwide are a testament to our nation's engineering superiority.

- Because a third of the SEMA's members are internal combustion engine (ICE) dependent, we especially welcome this proposed rule, which charts an important new direction for innovation and vehicle choice and promises to protect a \$100 billion segment of the U.S. economy, including more than 330,000 U.S. jobs.

The comments that follow outline why SEMA supports the EPA's proposal to repeal the GHG Endangerment Finding.

Rationale for Repeal

SEMA supports the EPA's proposal to repeal the Endangerment Finding in order to:

- restore the Clean Air Act to its proper scope;
- create long-term certainty for entire industries;
- protect consumer affordability and preserve vehicle choice;

- reduce adverse impacts on small businesses; and
- prevent a patchwork of competing federal and state mandates that destabilize markets by delegating policymaking back to the legislative branch.

Current GHG Standards Kneecap American Innovation

The automotive aftermarket industry is built around ingenuity and imagination, whereby automotive enthusiasts turn their passions into rewarding careers, and our best and brightest engineers deliver thoughtful, efficient, and elegant breakthroughs. If you are among the 160,000 people who annually attend the SEMA Show in Las Vegas (North America's largest trade show), you will see more than 1.3 million square feet of aftermarket innovation on display; indeed, SEMA's annual, trade-only event enables automotive specialty equipment manufacturers to debut new, innovative products and connect with industry buyers from all over the world.

A centerpiece of the SEMA Show is our "FutureTech Studio," where we showcase different propulsion technologies, including EV, hybrid, hydrogen, alternative fuels, and other technological advancements that represent the "what's next, what's possible" of the American automotive industry.

- You might note how EVs and EV technologies are prominently featured at every SEMA Show. That's because SEMA is not anti-EV, nor will it ever be. Rather, SEMA is passionate about protecting the freedom of businesses to deliver the next groundbreaking product, and the American consumer's freedom to choose whether that product fits their needs and lifestyle. Such innovation can only be delivered through technology-neutral government policy and by allowing the marketplace to drive demand for these products.

The innovation that displayed at the SEMA Show each year has come under assault by unelected policymakers at the federal and state levels, the roots of which are the 2009 endangerment finding on GHG.

Using the dubious claims codified through the endangerment finding, the EPA under President Biden, along with the state of California, embarked on a brazen attempt to mandate the sale of EVs and ban the sale of ICE vehicles. They did so knowing that such policies would force automakers to cease production and sales of vehicles that the American people have relied upon for nearly a century, despite the high costs, lack of infrastructure, and questionable environmental impact that EVs have.

When the Biden Administration set GHG standards for 2027 to 2032 light- and medium-duty vehicles, which would have required 67% of new vehicles sold to be electric by 2032, it put at risk thousands of specialty automotive aftermarket businesses that develop products solely for ICE vehicles. The Biden Administration's action served to further embolden California, which sought to enact EV mandates on 40% of the nation's population through its policies, which were set to be followed lockstep by 11 other states.

Accordingly, this proposal to repeal the GHG Endangerment Finding is a major step forward for businesses and consumers, including millions of automotive enthusiasts, who will no longer have their vehicle choices constrained by artificial government mandates that increased vehicle cost and limited which models were available in the marketplace.

Regulatory Overreach

The 2009 GHG endangerment finding extended the Clean Air Act well beyond its intended purpose. The Clean Air Act was never designed to regulate carbon dioxide or other greenhouse gases from mobile sources. For the specialty automotive aftermarket, these regulatory burdens have introduced engineering challenges, compliance costs, and restrictions that stifle innovation.

By revisiting and reconsidering the GHG endangerment finding, the EPA can restore regulatory clarity, align such regulations with congressional intent, and ensure that policymaking on issues of such broad economic and political significance rests with elected lawmakers.

In doing so, the EPA would not only reduce unnecessary costs and legal uncertainty but also create a more predictable and pro-innovation environment for industries like ours.

Economic Burden and Consumer Impact

EPA's GHG standards have contributed to rising vehicle prices, which reduce consumer options. This furthermore has shrunk the pool of vehicles available for aftermarket customization. SEMA data shows that 25% of drivers will customize their vehicles, with nearly two-thirds of that work performed within six months of the vehicle's purchase. This vibrant market, driven by consumer demand, is fertile ground for new ideas and innovations. These innovations deliver safer, more efficient vehicles, but need a solid foundation in the marketplace for investment in research and development to take place.

Instead, the GHG mandates favored by the Biden EPA and California tipped the market toward rapid electrification and overregulation, which threatened the vitality of small automotive aftermarket businesses and the livelihoods of the 1.3 million people they employ.

Our industry thrives on vehicle diversity and consumer choice. Mandating technology pathways such as electrification eliminates consumer options and limits innovation in performance, restoration, and specialty applications. Market-driven adoption of new technologies should be encouraged, but regulatory overreach undermines both consumer choice and the economic sustainability of thousands of American businesses.

Conclusion

The specialty automotive aftermarket is a uniquely American industry built on ingenious innovation, vibrant consumer enthusiasm, and an unmatched entrepreneurial spirit. The EPA's reconsideration of the 2009 GHG Endangerment Finding presents an opportunity to remove unnecessary regulatory barriers and allow market forces to guide technological progress in a way that is consumer-driven.

We urge the EPA to finalize the repeal of the Endangerment Finding and its related GHG vehicle standards.

SEMA thanks Administrator Zeldin and the Trump Administration for pursuing common-sense reforms that prioritize the American people and our nation's economy. This proposed rulemaking marks a significant policy shift that preserves vehicle choice and strikes a blow to previous efforts by government and environmental groups to advance destructive policies that limit vehicle choice, stifle innovation, and drive up the costs of new vehicles.

We appreciate this opportunity to comment and welcome continued dialogue with the EPA on policies that support economic growth, consumer choice, and small business viability. If you have any questions about our comments, please contact Eric Snyder, SEMA's senior director for federal government affairs, at erics@sema.org.

Sincerely,

/s/

Mike Spagnola
President and CEO