



U.S. Environmental Protection Agency (EPA)
EPA Docket Center, OAR Docket,
Mail Code 28221T,
1200 Pennsylvania Ave N.W.
Washington D.C. 20460

September 22, 2025

Re: EPA Docket No. EPA-HQ-OAR-2025-0194: Notice for Proposed Rulemaking on the Environmental Protection Agency's 2009 Endangerment Finding and to Repeal all Associated Greenhouse Gas (GHG) Vehicle Standards

The American Institute of Architects (AIA) is the voice of the architecture profession, representing over 100,000 licensed architects and allied professionals. Since our founding in 1857, the AIA has been a driving force for progress, shaping the built environment through advocacy, expertise, and a steadfast commitment to design excellence. AIA's leadership reflects the profession's purpose—a unified force working to create a more sustainable, resilient, healthy, and equitable built environment.

AIA submits these comments to express our strong opposition to the Environmental Protection Agency's (EPA) Notice of Proposed Rulemaking (NPRM), 2009 Endangerment Finding and to Repeal all Associated Greenhouse Gas (GHG) Vehicle Standards. Docket ID EPA-HQ-OAR-2025-0194. The AIA believes this proposed rule, which seeks to rescind the 2009 Greenhouse Gas (GHG) Endangerment Finding and repeal all GHG emission standards for new motor vehicles, will introduce significant economic disruption. This proposed action undermines the decades-long industry investment in sustainable and high-performance design, threatening to derail the very efforts that create a more resilient, healthy, efficient, and valuable built environment. It is a direct assault on the economic progress and stability achieved through predictable, science-based regulations.

The proposed rulemaking's claim that there is "no requisite technology" to address climate change is directly refuted by the architectural profession's demonstrated success. The AIA 2030 Commitment serves as a voluntary, actionable climate strategy that proves carbon reduction is not only possible but commercially viable. AIA's 2030 Commitment Design Data Exchange (DDX), a robust database of project performance, provides the evidence. This data shows that firms are meeting ambitious carbon reduction goals by leveraging commercially available tools and strategies. For example, large-scale, real-world projects such as the National Renewable Energy Laboratory's Research and Support Facility serve as indisputable proof that net-zero buildings are entirely feasible and scalable today.

The proposed rule's economic rationale, which focuses on short-term costs while ignoring substantial long-term benefits, is dangerously shortsighted. A stable, progressive regulatory climate is essential for long-term business planning and investment in sustainable infrastructure. The Institute's data demonstrates that high-performance design is an economically sound business strategy, resulting in energy cost savings, and Increased asset value, and promoting occupant health, and productivity.

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According to data from the AIA 2030 Commitment, these projects have already led to billions of dollars in operational savings. High performance buildings, on average, have 23% lower operating expenses and can command a capital value premium of over 20%, making them a more valuable asset. Furthermore, high-performance buildings improve occupant health and productivity, translating to a more productive workforce and significant economic benefits for businesses. In contrast, the long-term economic consequences of climate inaction, such as escalating costs from extreme weather events and infrastructure damage, far outweigh any purported short-term regulatory savings.

The NRPM's focus on a single industry – vehicle manufacturing – fails to recognize the interconnected nature of the built environment. As defined by the AIA, this includes not just building, but also roads, transportation systems, and the energy grid. The success of a building's performance is intrinsically linked to the transportation system, energy grid, and overall infrastructure. The architectural profession's mission, as laid out in the AIA Framework for Design Excellence, is to create a more resilient built environment through a holistic, cross-sectional approach. By undermining vehicle emission standards, the EPA directly hinders the progress architects and planners are making toward a fully integrated, low-carbon built environment.

AIA urges the EPA to withdraw the NPRM on the Environmental Protection Agency's 2009 Endangerment Finding and to Repeal all Associated Greenhouse Gas (GHG) Vehicle Standards. The proposed rule represents a fundamental step backward, threatening not only environmental progress but also the economic stability and long-term value creation in the built environment. The architectural profession has demonstrated that high-performance, carbon-neutral design is a profitable and viable business model, leading to increased property values, reduced operating expenses, and a more productive workforce.

The EPA's proposed action threatens to undo this economic progress, introducing uncertainty into the market and compromising the significant investments made by firms, developers, owners, and clients.

AIA urges the EPA to maintain the 2009 Endangerment Finding and to instead adopt a coordinated, cross-sectoral approach that recognizes the critical interdependence of transportation, energy, and the built environment. This strategic approach is essential to fostering a resilient and economically robust future. We appreciate your consideration and for additional information or clarification, do not hesitate to contact Michele Mihelic, Senior Director, Government Affairs and Public Policy at michelemihelic@aia.org.