



**Boston Trust Walden**

Principled Investing.

September 22, 2025

The Honorable Lee Zeldin  
Administrator  
US Environmental Protection Agency  
1200 Pennsylvania NW  
Washington, DC 20460

**Re: Reconsideration of the 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards (Docket: EPA-HQ-OAR-2025-0194)**

Dear Administrator Zeldin,

Boston Trust Walden Company is an independent, employee-owned investment management firm with approximately \$16.6 billion in assets under management.<sup>1</sup> We seek to invest in enterprises with strong financial underpinnings, sustainable business models, prudent management practices, and a governance structure that supports these objectives. Consideration of all relevant factors—including the evaluation of climate risks and opportunities—is part of our fiduciary duty to ensure client assets are invested in a set of securities well situated to produce attractive risk-adjusted returns over full market cycles.

This letter is regarding the US Environmental Protection Agency's (EPA) proposed reconsideration of the 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards. The Endangerment Finding provides the scientific and legal foundation for regulating greenhouse gas (GHG) emissions under the Clean Air Act. Since its inception, the Endangerment Finding has enabled a stable policy framework that supports economic growth including industrial expansion, job creation, and technological innovation across sectors. It has also provided a predictable policy framework for investors, including our firm, supporting long-term planning and risk-adjusted decision-making.

We urge the EPA to preserve the Endangerment Finding and believe it is incumbent on the EPA to consider the material financial impacts and regulatory uncertainty that companies may face if the Endangerment Finding were rescinded. We depend on US regulators, including the EPA, to provide stable policy frameworks reflective of the overwhelming evidence that climate change presents systemic risks to the US economy and financial system.<sup>2</sup> Further, the long-term prospects of the US economy depend upon healthy communities and ecological systems, both of which would be adversely impacted by this proposed rule change.<sup>3</sup>

Greenhouse gas emissions increase climate-related risks and therefore increase financial risks. In recent years, we have observed a significant increase in companies disclosing material climate-related risks in financial disclosures submitted to the Securities and Exchange Commission (SEC). The US Sustainable Investing Forum (US SIF) reported a three-fold increase in these climate-related financial disclosures between 2018 and 2024.<sup>4</sup> Simultaneously, at the macro level, the impacts from climate change continue to accelerate and manifest in real financial terms. In 2024 alone, the cost of extreme weather events in

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<sup>1</sup> AUM as of June 30, 2025, includes AUM of wholly-owned subsidiary Boston Trust Walden Inc.

<sup>2</sup> "Report on Climate-Related Financial Risk". US Financial Stability Oversight Council (FSOC). <https://home.treasury.gov/system/files/261/FSOC-Climate-Report.pdf>

<sup>3</sup> "Effects of Human-Caused Greenhouse Gas Emissions on US Climate, Health, and Welfare." National Academies of Sciences, Engineering, and Medicine. <https://www.nationalacademies.org/news/2025/09/national-academies-publish-new-report-reviewing-evidence-for-greenhouse-gas-emissions-and-u-s-climate-health-and-welfare>

<sup>4</sup> "US Sustainable Investing Trends 2024/2025". US Sustainable Investing Forum (US SIF). <https://www.ussif.org/research/trends-reports/us-sustainable-investing-trends-2024-2025-executive-summary>

the US was \$182.7 billion, including 27 separate weather and climate events incurring losses of more than \$1 billion.<sup>5</sup> As these events accelerate, we anticipate more companies may face increased risk exposure due to costly physical climate events, supply chain disruptions, restricted access to capital and insurance, and other cascading financial impacts.

Companies across industries—including transportation, utilities, energy, and manufacturing, among others—rely on policy certainty to inform strategic planning, capital deployment, and risk management. Many companies operate on multi-decadal investment horizons and sequence major infrastructure, R&D, and supply chain decisions on expected federal policies. Since the inception of the Endangerment Finding, GHG emissions standards have demonstrated congruency with commercial and industrial growth. Examples include significant electric vehicle manufacturing investments and job creation in the transportation sector<sup>6</sup>, investments by utility companies in clean energy and energy infrastructure<sup>7</sup>, continued growth in US oil and gas production<sup>8,9</sup>, as well as significant investments aimed at securing US leadership in the carbon capture and storage (CCUS) technology market<sup>10</sup>. We believe the Endangerment Finding is aligned with the government's stated goals to position the US as a global leader while artificial intelligence (AI) technologies scale, energy independence and innovation are pursued, and clean air for Americans is provided.

If the Endangerment Finding were rescinded or significantly weakened it would introduce substantial regulatory uncertainty, increase value-at-risk for companies, and present investors with greater exposure to unmanaged risks. It would also weaken the regulatory foundation that supports innovation and capital formation in lower-carbon industries (e.g., EVs, CCS), undermining US leadership and global competitiveness in growth sectors.

Without a consistent federal standard, companies may be forced to navigate a fragmented patchwork of state-level climate regulations that may accelerate in the absence of a federal GHG emissions regulation standard, creating significant compliance complexity, legal exposure, and operational inefficiencies that could directly affect companies' financial performance.

In summary, preserving the Endangerment Finding is essential to maintaining regulatory stability, supporting efficient capital allocation, and safeguarding long-term financial and economic resilience. Rescinding it would inject avoidable instability into markets, delay progress on climate risk mitigation, and compromise US leadership and competitiveness in a rapidly transitioning global economy.

We appreciate the EPA's consideration of our feedback and are available to discuss further, if helpful. Correspondence can be sent to [aaugustine@bostontrustwalden.com](mailto:aaugustine@bostontrustwalden.com).

Sincerely,



Amy D. Augustine  
Director of ESG Investing

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<sup>5</sup> "Assessing the U.S. Climate in 2024". U.S. National Oceanic and Atmospheric Administration (NOAA). <https://www.ncei.noaa.gov/news/national-climate-202413>

<sup>6</sup> US Electric Vehicle Manufacturing Investments and Jobs. Environmental Defense Fund (EDF). <https://library.edf.org/AssetLink/j1n8dp1041c0g2m68lf0m5qp7p1e2i45.pdf>

<sup>7</sup> Clean Energy Powers America. American Clean Power. <https://cleanpower.org/market-report-2024/>

<sup>8</sup> US Field Production of Crude Oil. US Energy Information Administration (US EIA). <https://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=pets&s=mcrfpus2&f=a>

<sup>9</sup> US Natural Gas Marketed Production. US EIA. <https://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=pets&s=mcrfpus2&f=a>

<sup>10</sup> Carbon Capture Investment Hits Record High of \$6.4 Billion. Bloomberg NEF. <https://about.bnef.com/insights/finance/carbon-capture-investment-hits-record-high-of-6-4-billion>