

[This template letter has been prepared by the Sabin Center for Climate Change Law to support local governments and local elected officials in submitting their own comments in the EPA Rulemaking “Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards,” 90 Fed. Reg. 36,288 (Aug. 1, 2025).

The template is intended as a starting point for municipal governments and officials to add facts, figures, and narratives relative to their own local contexts. There are bracketed notes throughout, and the letter should not be submitted to EPA without careful review to ensure all notes are addressed or deleted. Commenters do not need to use all portions of this template, and should feel free to adapt to their own contexts. Nothing in this template should be understood to be legal advice. The template is provided for informational purposes only and transmission of this information does not create, and receipt does not constitute, an attorney-client relationship between sender and receiver.

Completed comment letters may be submitted at the [Proposed Rules’ docket page on regulations.gov](#) by clicking the “Comment” button and following the instructions provided. Alternative mail-in instructions are provided on the docket page.

Comment letters are due to EPA by September 22, 2025.]

[City Letterhead]

September [XX], 2025

U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

VIA ELECTRONIC SUBMISSION

Subject: Proposed Rule, Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards,” 90 Fed. Reg. 36,288 (Aug. 1, 2025)

Docket No.: EPA–HQ–OAR–2025–0194; FRL–12715–01–OAR

To Whom It May Concern:

The [City of XX] submits this comment letter [or, in the case of an individual official or authorized representative, “On behalf of the City of XX, I write to submit this comment letter] in strong opposition to EPA’s proposal to reconsider or rescind the Endangerment Finding for greenhouse gases (GHGs) and to eliminate federal GHG standards for motor

vehicles. As a local government **[official]** charged with protecting the health, safety, and welfare of our residents, we **[I]** urge EPA to maintain the Endangerment Finding and the vehicle GHG standards that are critical to lessening the impacts of GHG-induced climate change in our communities.

1. Local governments are on the front lines of climate impacts.

Cities like **[City Name]** are already experiencing the consequences of climate change, which is caused in significant part by GHG emissions from motor vehicles and power plants in the U.S. Rising temperatures, heavier rainfall, and more frequent extreme events are straining public infrastructure and increasing costs for local governments. In **[City]**, for example:

[Note: cities can discuss here the impacts of GHG-induced climate change for their local governments and in their communities. Particularly helpful would be quantitative and qualitative inputs regarding climate impacts such as:

- **Extreme heat:** Higher summer temperatures and longer heat waves increase emergency room visits for heat-related illness, raise utility bills for cooling, increase the risk of electricity service outages, and put vulnerable populations such as seniors and outdoor workers at particular risk.
- **Air quality:** Hotter summers and increased vehicle emissions worsen smog and particulate pollution, exacerbating asthma and other respiratory conditions, especially in children.
- **Flooding and stormwater:** More intense rain events overwhelm stormwater systems and damage roads, transit systems, and public housing.
- **Infrastructure costs:** Roads, bridges, drinking water systems, and power infrastructure were not built for these conditions, creating costly repairs and premature replacement needs.
- **Disproportionate impacts:** Low-income neighborhoods and communities of color often bear the greatest burdens, facing higher exposure to flood risks, urban heat, and traffic-related pollution while having fewer resources to adapt.]

Rolling back the Endangerment Finding and vehicle GHG standards would undermine our ability to protect residents from these escalating harms.

2. The Endangerment Finding is grounded in sound science, including federal climate assessments.

EPA's 2009 Endangerment Finding rested on an extensive body of peer-reviewed science, which has only grown stronger in the years since. The Fifth National Climate Assessment, published in 2023, confirms that climate change is already harming U.S. cities and their residents, finding that "Cities are experiencing increased risks from climate hazards, including extreme heat, flooding,

sea level rise, drought, and wildfires”¹ and that “Infrastructure designed for past climate conditions is increasingly vulnerable, leading to rising costs for municipalities and residents.”²

These findings are borne out by the experiences of [city]. **[City has experienced... (tailor to unique local conditions; if needed, reference text included in the previous section)]**. The City of [name] urges EPA to regulate according to the best available science, including as it relates to increased climate hazards and infrastructure vulnerabilities at the local level.

3. Rescinding vehicle GHG standards would eliminate any meaningful regulation of transportation emissions.

Transportation is the largest source of greenhouse gas emissions in the United States, accounting for 28 percent of total emissions in 2022 according to EPA data.³ In the City of [name], transportation accounts for [xx percent] of all GHGs emitted within city boundaries.

Despite the outsized role of the transportation sector in national and local GHG emissions, Section 209 of the Clean Air Act⁴ preempts states and cities like this one from setting their own motor vehicle GHG standards. If EPA withdraws both the Endangerment Finding and the federal vehicle GHG standards, cities like **[City Name]** will be left without any recourse to address this dominant source of emissions and the resulting impacts as described above. EPA repeal of existing GHG standards for new motor vehicles will not empower local governments; it would leave us powerless to regulate transportation-related emissions, despite bearing the costs of their impacts.

Conclusion

The City of **[City Name]** strongly urges EPA to withdraw this proposal and retain the Endangerment Finding and federal vehicle GHG standards in their current form. Protecting the health and welfare of our residents requires continued recognition of the dangers posed by GHG emissions and decisive action to mitigate them.

Respectfully submitted,

[Name]

[Title, e.g., Mayor / City Manager / Other Authorized Signatory]

City of [City Name]

¹ NCA5, *Cities and the Built Environment*, Key Message 1, p. 1842.

² NCA5, *Cities*, p. 1845.

³ U.S. EPA, *Inventory of U.S. Greenhouse Gas Emissions and Sinks* (July 1, 2025), <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks>.

⁴ 42 U.S.C. § 7543.