



SHORELINE CITY COUNCIL

Mayor Chris Roberts
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Councilmember Betsy Robertson
Councilmember Keith Scully

September 11, 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:

On behalf of the City of Shoreline, I write to express our strong opposition to EPA’s proposal to reconsider or rescind the 2009 Endangerment Finding for greenhouse gases (GHGs) and to eliminate federal GHG standards for motor vehicles. As a local government official committed to protecting the health, safety, and welfare of our residents, I urge the EPA to maintain both the Endangerment Finding and the vehicle GHG standards. These tools are scientifically justified and legally essential for reducing the growing health and economic impacts of GHG-induced climate change in our community.

EPA’s 2009 Endangerment Finding is grounded in an extensive body of peer-reviewed science, which has only grown stronger in the years since it was adopted. The Fifth National Climate Assessment¹, published in 2023, confirms that climate change is harming residents of U.S. cities. The Assessment states:

- “Cities are experiencing increased risks from climate hazards, including extreme heat, flooding, sea level rise, drought, and wildfires,” and,
- “Infrastructure designed for past climate conditions is increasingly vulnerable, leading to rising costs for municipalities and residents.”

¹ USGCRP, 2023: Fifth National Climate Assessment. Crimmins, A.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, B.C. Stewart, and T.K. Maycock, Eds. U.S. Global Change Research Program, Washington, DC, USA. <https://doi.org/10.7930/NCA5.2023>

These findings align with other major assessments, including reports from the Intergovernmental Panel on Climate Change (IPCC, 2023²). These reports support the original Endangerment Finding’s conclusion that GHGs endanger public health and welfare.

Local Impact of GHG-Induced Climate Change

In Shoreline, we are already experiencing the consequences of climate change:

- Extreme heat:
 - During the 2021 Pacific Northwest “heat dome”, more than 400 people in Washington died from direct and indirect heat-related causes during a week-long extreme heat event³.
 - The average year in Western Washington is now 1.3°F warmer than the 20th-century average. According to the University of Washington Climate Impacts Group, by the 2050s, the hottest summer days in our region may be 4.0°F to 10.2°F hotter than current extremes—posing severe risks to public health and emergency preparedness.
- Air quality deterioration: Rising temperatures and increased vehicle emissions contribute to ground-level ozone and PM2.5 pollution, exacerbating asthma and cardiovascular conditions. This disproportionately affects vulnerable populations including children and the elderly.
- Extreme precipitation: The intensity of heavy rainfall events in Western Washington has already increased. By the 2080s, the region is projected to see at least 6.4% more annual precipitation, with more intense rain events that threaten to overwhelm Shoreline’s stormwater systems, leading to road damage, property loss, and public safety risks. (UW Climate Impacts Group, “State of Knowledge” Report, 2023)

These local climate impacts are directly tied to GHG emissions and are expected to worsen without meaningful federal action. Rolling back the Endangerment Finding and vehicle GHG standards would undermine our ability to protect residents from these escalating harms.

Transportation Emissions and Environmental Health in Shoreline

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.⁴ In the City of Shoreline, transportation accounts for 55% of all GHGs emitted within city boundaries. Two major highways, Interstate 5 and Highway 99, run through our city. Residents living near these corridors are disproportionately exposed to air pollutants currently regulated by the Endangerment Finding.

² IPCC, 2023: *Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change* [Core Writing Team, H. Lee and J. Romero (eds.)]. IPCC, Geneva, Switzerland, 184 pp., doi: 10.59327/IPCC/AR6-9789291691647.

³ Vogel, J., J. Hess, Z. Kearn, K. Naismith, K. Bumbaco, B.G. Henning, R. Cunningham, N. Bond. 2023. In the Hot Seat: Saving Lives from Extreme Heat in Washington State. Report prepared by the University of Washington’s Climate Impacts Group, UW’s Center for Health and the Global Environment, the Washington State Department of Health, the Office of the Washington State Climatologist, and Gonzaga University’s Center for Climate, Society & the Environment

⁴ 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>.

According to the Washington State Environmental Health Disparities Map:

- Nearly all census tracts in Shoreline rank 8 or higher (out of 10) for diesel exhaust exposure.
- 8 of our 11 census tracts rank 9 or 10 out of 10 for proximity to heavy traffic roadways.

This means that withdrawing the Endangerment Finding and weakening vehicle GHG standards would increase pollution exposure for a majority of our residents, with serious implications for public health—especially for children, seniors, and those with pre-existing conditions.

The City of Shoreline strongly urges EPA to withdraw its proposal and retain both the 2009 Endangerment Finding and the federal vehicle GHG standards in their current form. Weakening or repealing these foundational protections would not only contradict the best available science, but also undermine our ability as a local government to protect our residents from the worsening impacts of climate change.

We urge EPA to maintain its legal authority and scientific integrity in the face of this unprecedented climate crisis. Our communities depend on it.

Respectfully submitted,
Chris Roberts
Mayor
City of Shoreline