



August 28, 2025

Administrator Lee Zeldin  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460  
Dear Administrator Zeldin,

Re: Opposition to Endangerment Finding Revocation

Dear Administrator Zeldin:

On behalf of the Climate, Energy, and Environment Policy Committee (CEEPC) of the Metropolitan Washington Council of Governments (COG), I am writing to offer our opposition to EPA's proposal to reconsider and repeal the 2009 Greenhouse Gas (GHG) Endangerment Finding and to rescind associated vehicle GHG standards. As the association of local governments in the metropolitan Washington area, COG opposes your efforts to roll back EPA regulatory authority, which would undermine years of progress in addressing air quality in the region.

We urge EPA to withdraw the proposal and retain the Finding and related standards. Should EPA ultimately revoke the Finding, Congress must act swiftly to codify explicit, durable federal authority to regulate GHGs across sectors, including motor vehicles, to protect public health, provide regulatory certainty, and maintain U.S. economic competitiveness.

Metropolitan Washington has adopted a 50% regional GHG reduction goal by 2030 (vs. 2005), supported by an action plan spanning transportation, buildings, energy, and waste. Federal vehicle GHG standards are a critical pillar for meeting this goal, alongside state and local measures. Weakening or eliminating federal GHG authority would shift disproportionate burdens onto local governments, fragment national policy, and impede attainment of regional climate and air-quality objectives.

The Endangerment Finding is based on an extensive scientific record and a clear legal pathway, as affirmed by *Massachusetts v. EPA*. The 2009 Finding remains EPA's formal determination under §202(a) and is the predicate for multiple programs that have delivered climate and health benefits nationwide. Repeal would create uncertainty around statutory and settled expectations for states, MPOs, and local governments.

EPA's announced rationale emphasizes near-term compliance cost savings from eliminating GHG standards (e.g., claims on the order of \$54 billion annually). However, those estimates fail to incorporate the long-term costs of climate damages, public health burdens, and investment uncertainty that a federal retreat would impose on households, firms, and local governments—including those in our region. Business certainty and durable, technology-neutral federal frameworks better support investment, innovation, and jobs in clean transportation and energy.

Please contact Jeff King, Director of Climate, Energy and Air Programs, at 202-962-3238 or [jking@mwkog.org](mailto:jking@mwkog.org) if you have any questions. Thank you for your consideration.

EPA Administrator Lee Zeldin

Sincerely,

Sarah Bagley, Chair  
Climate, Energy, and Environment Policy Committee (CEEPC)