



City of Santa Barbara

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The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: Docket ID No. EPA-HQ-OAR-2025-0194 – Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards

Dear Administrator Zeldin,

On behalf of the City of Santa Barbara, I strongly oppose the Environmental Protection Agency's proposal to rescind the 2009 Endangerment Finding and related vehicle greenhouse gas emissions standards. While regulatory review is important, this action would create significant environmental, legal, and economic uncertainty that harms both California and the nation. It would also strip away one of the most effective federal tools to limit greenhouse gas emissions, weakening our ability to protect residents, the economy, and the environment from worsening climate impacts.

Earlier this year, Congress invoked the Congressional Review Act through H.J. Res. 87, H.J. Res. 88, and H.J. Res. 89 to disapprove three EPA waivers granted to California for its heavy-duty and passenger vehicle programs. This action marked the most significant challenge in decades to California's long-standing authority under the Clean Air Act to set its own vehicle emissions standards. Whether these waivers qualify as rules subject to CRA review remains under legal debate, which has already created uncertainty for states, manufacturers, and markets. Eliminating the 2009 Endangerment Finding would further erode regulatory clarity. California has stated that if greenhouse gases are not regulated under the Clean Air Act, it would no longer require EPA approval to set its own tailpipe emissions rules. This could result in conflicting state and federal standards, making compliance more complex and costly for the transportation sector nationwide.

In addition to the legal and jurisdictional impacts, eliminating the Endangerment Finding would have severe consequences for our ability to address climate change. The transportation sector remains one of the largest sources of greenhouse gas emissions in the United States, and strong vehicle standards are essential to achieving meaningful emissions reductions. Weakening or removing these protections will result in higher emissions for years to come, accelerating sea-level rise, increasing the frequency and severity of extreme weather events, and worsening air quality. For a coastal city like Santa Barbara, these changes are not abstract. They mean greater vulnerability to flooding, erosion of our shoreline, more intense and frequent wildfires, prolonged droughts, and increased risks to public health.



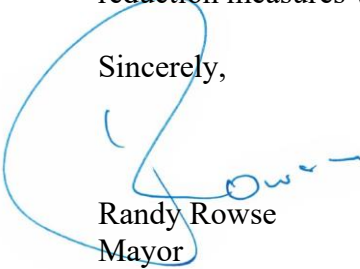
Please consider the environment before printing this letter.

Furthermore, the uncertainty created by removing the Endangerment Finding would also have significant economic consequences. Businesses rely on regulatory stability to make long-term decisions about infrastructure, manufacturing, and workforce development. Sudden changes to foundational federal determinations disrupt planning cycles, create compliance confusion, and slow innovation. This instability threatens not only the clean technology sector but also industries that depend on predictable transportation and energy markets. Weakening these standards would hinder the nation's competitiveness in the global shift to cleaner energy, allowing other countries to capture the jobs, investment, and market share tied to advanced clean technologies.

For Santa Barbara, maintaining a clear and consistent regulatory framework is essential. Local governments must plan for infrastructure, transportation, and public health investments years in advance. Policy instability at the federal level undermines these efforts, complicates coordination with state agencies, and risks costly delays in critical projects. Strong vehicle standards are also crucial to protecting our natural environment, which underpins our tourism economy and quality of life.

For these reasons, the City of Santa Barbara urges the EPA to withdraw the proposed reconsideration of the 2009 Endangerment Finding and retain the current vehicle greenhouse gas standards. We believe that maintaining regulatory clarity while preserving proven emissions reduction measures will better serve the interests of the public.

Sincerely,



Randy Rowse
Mayor