



September 18, 2025

Lee Zeldin, Administrator
Environmental Protection Agency
Office of the Administrator, Mail Code 1101A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: City of Aspen Supports Preserving the 2009 Endangerment Finding and Federal Greenhouse Gas Emissions Standards for Motor Vehicles

Dear Lee Zeldin:

The City of Aspen submits this comment letter in strong opposition to the EPA's proposal to reconsider the Endangerment Finding for greenhouse gases (GHGs) and to eliminate federal GHG standards for motor vehicles. The Endangerment Finding is the foundational underpinning of the regulatory framework that guides how EPA protects our residents and businesses from the impacts of climate change.

The city has long been a leader in advancing bold climate action, grounded in local values and science-based policy. Aspen relies on its environment as part of its appeal for recreation and tourism and has invested heavily in areas such as climate resilience, clean energy, and local air quality protections to help ensure that it continues to be enjoyed by future generations. Rolling back the Endangerment Finding and vehicle GHG standards would undermine years of progress and our ability to protect our community from GHG-induced climate change harms.

Aspen is already experiencing the consequences of climate change which is caused in significant part by GHG emissions from motor vehicles and power plants in the US. Rising temperatures, wildfire smoke, drought, shifting rain and snow patterns, and more precipitation arriving as rain rather than snow are disrupting our business as usual. The number of consecutive frost-free days in Aspen has increased by forty-six days since 1940 and by thirty days since 1980, representing the loss of over a month of winter in less than a lifetime and decrease in snowpack millions of Colorado river users depend upon. In cities like Aspen, these changes are seen as an existential threat to our unique mountain ecosystems, public infrastructure, and our recreation and place-based economy.

Aspen has adopted science-based GHG emissions reduction targets which represent our fair share of emissions reductions needed to keep global temperature rise to below 1.5 degrees Celsius. These targets are intended to lessen the impacts of climate change and amount to a 63.4% emissions reduction by 2030 and a 100% reduction by 2050 (based on 2017 emissions levels). The city cannot achieve its climate goals without the EPA's help to regulate GHG pollutants that endanger public health and welfare and GHG standards for new vehicles and engines.

Both nationally, and in Colorado, transportation is the largest source of GHG emissions across all sectors. In Aspen, where our community has prioritized mass transit, bicycle and pedestrian infrastructure, electrification, and programs designed to reduce single occupant vehicles driving,

on-road transportation has a smaller emissions profile than commercial and residential buildings. A co benefit of these programs is improved standards of livability, safety, and less air pollution as result of reducing tailpipe emissions occurring in our community. If the EPA withdraws the Endangerment Finding and the federal vehicle GHG standards, progress made on reducing transportation sector emissions in Aspen risk being undone.

Ensuring clean air in cities like Aspen is critical for protecting the health of residents and visitors. Programs designed to monitor ozone and particulate matter and reduce vehicle-related emissions depend on strong national standards and scientific guidance. Without this foundation, our ability to respond to climate-driven air quality threats, such as wildfire smoke and ground-level ozone, would be compromised.

The City of Aspen strongly urges the EPA to regulate GHG emissions according to the best available science and retain the Endangerment Finding and federal vehicle GHG standards in their current form. Protecting the health and welfare of our community requires continued recognition of the dangers posed by GHG emissions and decisive action to mitigate them.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rachael E. Richards". The signature is fluid and cursive, with a large loop at the end.

Rachael E. Richards, Mayor