

Office of Sustainability; Health Department

U.S. Environmental Protection Agency
1200 Pennsylvania Avenue
N.W. Washington, D.C. 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:

Multnomah County is submitting these comments to express our strong opposition to the Environmental Protection Agency (EPA) proposal to reconsider or rescind the 2009 Endangerment Finding regarding greenhouse gases (GHGs) and to eliminate federal GHG standards for motor vehicles. We urge EPA to reaffirm its longstanding science-based conclusion that these emissions pose significant risks to human health and the environment, and impose substantial taxpayer burden, both nationally and in Multnomah County.

Climate and Severe Weather Impacts

The Fifth National Climate Assessment (Assessment), published in 2023, confirms that climate change is harming residents throughout the U.S., including in the Pacific Northwest. The report notes that temperatures in the Pacific Northwest have already increased by 2.5 degrees Fahrenheit over pre-industrial levels, and that warming is projected to increase to even more alarming levels by 2080 with a range between 4.7 - 10 degrees Fahrenheit. Drought, severe negative impacts to farming and forestry sectors, widespread wildfires and smoke incursions into populated areas, sea level rise, and many other adverse impacts are already buffeting Oregonians today. The issues in Multnomah County are acute and, absent EPA regulations to curb harmful greenhouse gas emissions, will only intensify.

Multnomah County, Oregon's most populous county, has experienced persistent and acute climate fueled emergencies that were simply unheard of even a decade ago. While local governments are working to address vulnerabilities, federal regulations of greenhouse gas emissions are needed to prevent the situation from getting worse. The Assessment states, “Infrastructure designed for past climate conditions

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is increasingly vulnerable, leading to rising costs for municipalities and residents.” These findings match the experiences of Multnomah County.

Throughout the period of June 25, 2021 – July 2, 2021, Multnomah County experienced an extreme weather event known colloquially as a “heat dome,” that struck with an intensity and relentlessness unlike any weather before it in the region’s recorded history. During this time, the county recorded record-breaking high temperatures of 108°, 112°, and 116° Fahrenheit over a period of three consecutive days. Temperatures as high as 124° Fahrenheit were recorded in some Portland neighborhoods with more pavement and fewer trees. The intense heat caused enormous harm to the county and its residents. There were 69 heat-related deaths among county residents during this week,¹ most of whom died while inside their homes. More county residents lost their lives from the June 2021 extreme heat event in Multnomah County than died from heat in the entire State of Oregon in the past 20 years.² In addition, deaths from all causes were double the normal level during the week of the heat dome, and there were 257 emergency department visits for heat illness in Multnomah County in 2021 – more than three times the typical count for the entire year.³ In addition, all-cause mortality spiked far above normal levels in June 2021, 37% higher than the average value from 2019 and 2020 (id).

Despite mobilizing substantial human and financial resources to protect the community, Multnomah County and other regional partners and jurisdictions were not prepared for the intensity, duration, and severity of this extreme heat event as it happened when it happened. In the end, the 2021 extreme heat dome led to a sharp increase in heat-related deaths, excess mortality and morbidity, and hospitalizations, and these impacts were not experienced equally: they were most devastating to those in the community who are already the most vulnerable and least able to cope including older adults, low-income individuals, pregnant people, veterans, and those without access to cooling.⁴ The greatest harms often fall hardest on historically marginalized and environmental justice communities, compounding existing health inequities. Federal GHG standards are essential to prevent worsening disparities.

While the heat dome is the most extreme impact of climate change observed in Multnomah County to date, it is by no means the only one. In 2017 extreme drought conditions set the stage for massive fires that scorched the Columbia River Gorge in Multnomah and Hood River counties, devastating natural areas, harming tourism, and destroying infrastructure and private property. In September 2020, a series

¹ Final report: health Impacts from Excessive Heat Events in Multnomah County Oregon 2021

² Final report: health Impacts from Excessive Heat Events in Multnomah County Oregon 2021

³ Final report: health Impacts from Excessive Heat Events in Multnomah County Oregon 2021

⁴ June 2021 Extreme Heat Event Preliminary Findings and Action Steps

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of extraordinary wildfires started in forested areas of the Cascade and Coastal mountain ranges, sending dangerous and unprecedented amounts of smoke into Multnomah County. Multnomah County experienced its unhealthiest air ever recorded during this event. Daily emergency department and urgent care visits reached a peak of 270 visits on September 14th, 75% higher than the average over the previous four weeks.. Chronic health impacts from this event may take time to fully understand, but exposure to wildfire smoke has tremendously negative health effects and can lead to significant additional morbidity and mortality over time. Air quality across the West is deteriorating, after years of improvement, because of the steady and recurring intrusion of wildfire smoke into populated areas, including dense urban areas like Multnomah County.

The same stressors that are impacting human life and health are also impacting ecosystems that are vital to the economy and protected by treaty obligations to Federally recognized tribal governments. This is especially true of native salmonid species and other anadromous fish species. According to the Fifth National Climate Assessment, Chapter 27, increasing stream temperatures and impacts from wildfires are persistent stressors on these fish populations. In addition heat waves have led to sharp contractions in salmon populations in streams, while marine heat waves are impacting salmon during the ocean born part of their lifecycle. Combined with other pressures, the impacts of the climate crisis are leading to a rapid downward spiral in fish populations that may lead to the localized extinction of these vital fish species.⁵

These events are not isolated; together they reflect a broader pattern of escalating climate extremes in the Pacific Northwest, each compounding health, economic, and environmental burdens on our residents.

Impact of Transportation Emissions

This is not the time to rescind the Endangerment Finding. Multnomah County residents, particularly those living near Interstate 5, port facilities, and other major transportation hubs, are already directly affected by the air pollution currently regulated by the Endangerment Finding. The ruling has played a critical role in justifying regulatory measures that reduce pollutants from vehicle exhaust, thus protecting those most vulnerable to respiratory and cardiovascular illnesses.

⁵ Chang, M., et al. "Ch. 27. Northwest." Fifth National Climate Assessment, edited by A.R. Crimmins, et al., U.S. Global Change Research Program, 2023, doi:10.7930/NCA5.2023.CH27.

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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.⁶ In Multnomah County, transportation accounts for an even larger share of greenhouse gas emissions, 40% of all GHGs emitted within county boundaries.⁷

Despite the outsized role of the transportation sector in national and local GHG emissions, Section 209 of the Clean Air Act⁸ preempts states and counties from setting their own motor vehicle GHG standards. If EPA withdraws both the Endangerment Finding and the federal vehicle GHG standards, the residents of Multnomah County will be left without any recourse to address this dominant source of emissions and the resulting, clearly-evidenced health impacts. 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.

In Multnomah County PM 2.5 diesel pollution is concentrated along major transportation corridors, with higher levels around downtown Portland. The county's geography, including its position as a major freight hub, contributes to these elevated levels.⁹ This is compounded by emissions from passenger vehicle internal combustion engines. Withdrawing the Endangerment Finding would increase pollution in these areas and further impact the health of our community members, including children, seniors, and individuals with existing medical conditions. These are communities that are already negatively affected by increasing wildfire smoke in our region.

Evidence consistently shows that poor air quality contributes to increased rates of asthma, bronchitis, heart attacks, and other serious medical conditions. The number of emergency department, urgent care visits and hospitalizations for non-infectious respiratory illness has continued to increase across Clackamas, Multnomah, and Washington counties from 2019 to 2024. The number of asthma-related hospitalizations has steadily increased in all three counties since 2020 and the number of asthma-related deaths increased in all three counties since 2019. When these ailments strike, the burden of care often falls on public healthcare systems, emergency services, and Medicaid—all of which are funded through taxpayer dollars. Every spike in respiratory illness, ER visits, and hospitalizations translates into higher

⁶ 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>.

⁷ Portland Bureau of Planning and Sustainability. "Climate and Energy Dashboard." *Tableau Public*, public.tableau.com/app/profile/portland.bps/viz/ClimateandEnergyDashboard/ClimateandEnergyDashboard. Accessed 11 Sept. 2025.

⁸ 42 U.S.C. § 7543.

⁹"2023 Environmental Justice Snapshot." 2023. Multnomah County Health Department Environmental Health Services Division. July 2023. https://multco.us/file/2023_environmental_justice_snapshot_report/download

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Medicaid expenditures, public health costs, and lost worker productivity—costs borne by taxpayers and local governments. By protecting air quality, the Endangerment Finding helps prevent health crises and reduces long-term, avoidable fiscal burdens on local and state budgets. The Endangerment Finding is not merely a symbolic document. It is the legal and scientific foundation required for safeguarding public health and the consumer pocketbook. Its withdrawal would dismantle critical protections, undermine health, and ultimately cost taxpayers more in health and economic harms.

We strongly urge the EPA to uphold the Endangerment Finding, maintain federal GHG standards for motor vehicles, and continue guiding the United States toward a cleaner and more resilient future. Absent federal standards, local governments like ours face a substantive disadvantage when addressing this dominant emissions source, even as we shoulder the health and fiscal consequences.

Given the gravity of the proposed changes, and the certainty that repealing the Endangerment Finding and the elimination of federal GHG standards for motor vehicles will have substantial and irreversible negative impacts on Multnomah County we respectfully ask that EPA respond to the following questions:

1. How is the Administration concluding that carbon pollution does not endanger human health and welfare? What authoritative scientific sources is the Administration using to make their determination in this rule making process?
2. What is the cost estimate for increased healthcare needs, loss of earning potential, and higher utility bills Multnomah County residents will have to bear as a result of reduced air pollutant regulation? How does the EPA justify this burden on low-income and working families?
3. How does the EPA plan to address the health and economic impacts of extreme heat in areas like Multnomah County, where most homes lack cooling systems due to the historically temperate climate in the Pacific Northwest, without regulating climate pollutants?
4. How will the EPA and other federal agencies such as FEMA and U.S. Army Corps of Engineers mitigate the escalating impacts of heat, wildfires, smoke, flooding, and drought without addressing their root cause—GHG emissions?
5. How does the EPA intend to uphold protections for endangered salmonid species and other endangered anadromous fish species in the Columbia River basin, endangered southern resident

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killer whales, tribal treaty rights, and freshwater access in our region without regulating climate-warming emissions?

6. What role, if any, does the EPA have in regulating greenhouse house gases or in otherwise mitigating further warming from the accumulation of greenhouse gases in the atmosphere?

Multnomah County strongly urges EPA to withdraw this proposal and retain the Endangerment Finding and the 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.

Sincerely,



John Wasitutynski
Director, Office of Sustainability



Kirsten Aird
Public Health Director