



City of Needles

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September 2, 2025

United States Environmental Protection Agency (EPA)
Docket Center
WJC West Building, Room 3334
1301 Constitution Avenue NW
Washington, DC 20004
Email: a-and-r-Docket@epa.gov

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

To Whom It May Concern,

On behalf of the Board of Public Utilities for the City of Needles, we submit these comments in support of the EPA's proposal to repeal its 2009 Endangerment Finding.

For decades, small municipal utilities such as ours have faced significant financial strain from federal greenhouse gas regulations. These rules require utilities to purchase costly allowances and offsets annually, diverting scarce resources away from maintaining infrastructure and delivering reliable service. For the City of Needles, these costs translate into higher utility rates for working families and a reduced ability to invest in water, wastewater, and energy reliability.

In addition, greenhouse gas vehicle standards would force small jurisdictions to prematurely replace entire municipal fleets — an unfunded mandate that our residents cannot afford.

The 2009 Endangerment Finding has served as the legal foundation for wide-ranging regulations across multiple sectors. While intended to address climate and public health risks, compliance with these rules has placed disproportionate burdens on smaller communities with limited financial capacity. We believe EPA should re-examine the balance between the intended environmental benefits and the significant costs imposed on ratepayers and local governments.

Carbon dioxide (CO₂) is a greenhouse gas produced naturally and through human activity, including the combustion of hydrocarbons for energy. While CO₂ accounts for only about 0.04% of the Earth's atmosphere, it plays an important role in regulating global temperatures. At the same time, water vapor is the most abundant greenhouse gas, and natural processes such as wildfires and ocean cycles contribute significantly to overall greenhouse gas emissions.

Our concern is not to deny the role of CO₂ in the atmosphere, but to emphasize that the current regulatory framework does not adequately account for natural variability and the

high costs borne by small communities. Regulations should be based on a practical evaluation of both scientific evidence and economic impact, ensuring that compliance requirements are achievable without undermining local infrastructure investment or affordability for residents.

For these reasons, the City of Needles Board of Public Utilities supports EPA's proposal to repeal the 2009 Endangerment Finding and associated vehicle standards. A return to commonsense policy will allow local governments to focus on delivering affordable, reliable service rather than diverting scarce resources toward costly regulatory compliance.

If you have any questions, please contact Rainie Torrance, Utility Manager at rtorrance@cityofneedles.com or (760)326-5700 X140

Terry Campbell
Board of Public Utilities Chairman