September 22, 2025

Administrator Lee Zeldin
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

RE: American Society of Landscape Architects' Opposition to the Rescission of the Environmental Protection Agency's Endangerment Finding on Greenhouse Gas Emissions—Docket ID No. EPA-HQ-OAR-2025-0194

Dear Administrator Zeldin:

On behalf of the 16,000 members of the American Society of Landscape Architects (ASLA), we are writing to express our strong opposition to the rescission of the 2009 U.S. Environmental Protection Agency (EPA) Endangerment Finding on Greenhouse Gas Emissions.

Specifically, we oppose the proposed rule (EPA-HQ-OAR-2025-0194) published by EPA, Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards, published July 29, 2025, at 90 Fed. Reg. 36288. The Endangerment Finding is a formal 2009 EPA determination that greenhouse gases like carbon dioxide (CO_2) and methane (CH_4) endanger public health and welfare. EPA relied on extensive reviews of decades of scientific research and peer-reviewed assessment reports synthesizing thousands of individual climate science studies,[1] which then allowed the agency to regulate these emissions under the Clean Air Act. In 2016, EPA affirmed that finding based on its review of updated science.[2] Now, without supporting scientific evidence, EPA is proposing to repeal this finding—threatening to strip away the basis for regulating climate pollution. ASLA urges EPA to continue to follow the science, which clearly concludes that greenhouse gas emissions endanger human health, safety, and economic well-being, and to maintain the 2009 Endangerment Finding.

Repealing EPA's 2009 Endangerment Finding will have a range of negative impacts on public health, welfare, and economic well-being. Landscape architects are STEM-educated, licensed design professionals who work with communities on a daily basis to

[1] Natural Resources Defense Council (2025, August). *EPA'S Endangerment Finding: The Legal and Scientific Foundation for Cutting Climate-Changing Pollution.* https://www.nrdc.org/sites/default/files/epa-endangerment-finding-fs.pdf

[2] Congressional Research Service (2025, June 6). *EPA to Revisit Greenhouse Gas Endangerment Finding*.

mitigate and recover from the negative impacts of severe weather-related events. These impacts are expected to worsen as greenhouse gas emissions increase.

Increased greenhouse gases are contributing to extreme heat, threatening human life and health.

Increased concentrations of greenhouse gases are trapping excess heat and leading to a rise in global average temperatures. As the atmosphere warms, temperatures rise more often and for longer periods, increasing the frequency and severity of heat waves and other extreme heat events. Today, extreme heat is the deadliest of all weather-related disasters.[3]

In 2024, the United States experienced the hottest year on record, as many cities endured record-breaking temperatures, and heat waves became more frequent and intense.[4] These high temperatures coincided with 2024's climbing global carbon emissions from burning coal, oil, and methane gas to their highest levels ever.[5] In September 2024, much of Southern California, Nevada, and Arizona endured daytime temperatures exceeding 100 °F, with overnight lows failing to drop below 80 °F, compounding the health risks and stress on communities. This heat wave occurred when temperatures were already 10–20 °F above the seasonal norm, exemplifying how increasingly intense and prolonged heat events are becoming.[6] In this southwest region of the country, there was a significant rise in emergency room visits for heat-related illnesses. The Arizona Public Health Association reported that heat-related deaths rose 350 percent to become

[3] Hirchfeld, D. & Guenther, A. (2024, March). *Landscape Architecture Solutions to Extreme Heat.* American Society of Landscape Architects Fund (ASLA Fund). https://www.asla.org/evidence

[4] Climate Central (2025, January 10). *Off-the-Charts Heat: 2024 Global and U.S. Temperature Review*. https://www.climatecentral.org/climate-matters/2024-global-and-us-review

[5] Climate Central (2025, January 10). *Off-the-Charts Heat: 2024 Global and U.S. Temperature Review*. https://www.climatecentral.org/climate-matters/2024-global-and-us-review

[6] National Oceanic and Atmospheric Administration (2025, June 24). *NOAA experts provide data, tools and information to help people understand, prepare for and adapt to our changing climate*. https://www.noaa.gov/climate

the 12th leading cause of death in the state.[7] Over 1,000 deaths were attributed to heat across the United States during the 2024 heat waves.[8]

Landscape architects design nature-based solutions on various scales that address extreme heat. Projects like green roofs, living walls, tree canopies, parks, and other green spaces replace heat-trapping concrete and other impervious surfaces to help cool communities. Further, nature-based solutions release water vapor into the air through their leaves, a process known as evapotranspiration, which cools the surrounding environment. While these and other landscape architecture design techniques help address extreme heat, reducing greenhouse gas emissions is critical to mitigating extreme heat and protecting human health and well-being.

Increased greenhouse gases are contributing to record flooding, threatening human life, health, and property.

Greenhouse gases from human activities—such as burning fossil fuels—trap heat, leading to increased flooding through more intense rainfall events and rising sea levels. This cycle creates a feedback loop where flooding also alters soil conditions, potentially increasing emissions of other greenhouse gases like methane and nitrous oxide.[9]

Flooding is the most common and costly natural disaster in the United States, causing annual costs estimated between $179.8 billion and $496 billion due to property and infrastructure damage, business disruptions, lost wages, and declining property values. These costs are increasing due to the rising frequency and severity of floods, with the total damage from exceeding $2.9 trillion between 1980 and 2024.[10]

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[7] Arizona Public Health Association (2025). *Leading Causes of Death in AZ in 2024—Heat Deaths up 350% in Last 5 Years; COVID Continues its Drop in 2024*. https://azpha.org/2024/12/26/leading-causes-of-death-in-az-in-2024-heat-deaths-up-350-in-last-5-years-covid-continues-its-drop-in-2024/

[8] National Oceanic and Atmospheric Administration (2024, September 13). Heat wave in Southern California and the Southwest in early September 2024. https://www.climate.gov/news-features/event-tracker/heat-wave-southern-california-and-southwest-early-september-2024

[9] Atmospheric Environment: X (2025, April). *Soil flooding increases greenhouse gas fluxes*. Science Direct. https://www.sciencedirect.com/science/article/pii/S2590162125000231#:~:text=Flooding%20can%20cause%20undesirable%20effects,et%20al.%2C%202017

[10] U.S. Congress Joint Economic Committee (2024, June). *Flooding Costs the U.S. Between $179.8 and $496.0 Billion Each Year.* https://www.jec.senate.gov/public/_cache/files/249c68a8-4326-434e-9d06-db6079ddda90/jec-report-on-economic-cost-of-flooding.pdf

The economic toll includes impacts on critical infrastructure, agriculture, and tourism, with significant financial strain on communities and potential long-term population decline in affected areas.

According to research from the National Aeronautics and Space Administration (NASA), the proportion of people across the globe living in flood-prone areas has risen by 20 to 24 percent since 2000—10 times greater than the number previous models had predicted—as extreme weather drives intense rainfall, rising sea levels, and more severe hurricanes.[11]

Florida is among the states most exposed to sea level rise and coastal storms. With its low-lying coastal topography and more than 8,400 miles of shoreline, much of Florida and its coastal population are vulnerable to the impacts of rising sea levels.[12] By 2100, Florida could see a combined loss of $619 billion in assessed property value due to chronic flooding. This significantly impacts local governments, as properties that become chronically flooded fund nearly 30 percent of revenue for over half of Florida's municipalities.[13]

Along with property damage and catastrophic economic impacts, flooding also adversely affects human health and well-being, including accidental injury and drowning, exposure to waterborne and infectious diseases, respiratory and related allergic health effects due to dampness or mold, and sickness caused by contaminated drinking water. In 2022, historic flooding in Jackson, Mississippi, damaged operations at a water treatment plant, leaving more than 150,000 people without safe drinking water for weeks.[14]

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[11] NASA Earth Observatory (2021, September 27). *Research Shows More People Living in Floodplains.* https://www.earthobservatory.nasa.gov/images/148866/research-shows-more-people-living-in-floodplains

[12] Florida State University—Florida Climate Center. *Sea Level Rise.* https://climatecenter.fsu.edu/topics/sea-level-rise

[13] Central Florida Public Media (2023, October 16). *New study projects sea level rise to drain Florida's financial future.* https://www.cfpublic.org/environment/2023-10-16/sea-level-rise-drain-floridas-financial-future

[14] Johns Hopkins Bloomberg School of Public Health (2024, July 30). *The Visible and Unseen Dangers Lurking in Floodwater.* https://publichealth.jhu.edu/2024/the-dangers-of-floodwater

Working at every scale—from local parks to entire regions—landscape architects collaborate with agencies and communities to prevent flooding using bioswales, green roofs, rain gardens, permeable surfaces, and more. Landscape architects employ their knowledge of ecology and biology to also keep coastal communities safe. Using innovative concepts like living shorelines, which use natural materials to protect people and wildlife near coastal waters, landscape architects make coastal communities more resilient. Also, according to the Congressional Research Service, nature-based solutions to address stormwater cost 5 to 30 percent less to build—and up to 25 percent less to maintain—than conventional water management systems,[15] making them cost-effective tools to address flooding and other stormwater management issues. Landscape architects have successfully worked with communities to manage stormwater and flooding, but only a significant reduction in greenhouse gas emissions can effectively address this crisis, prevent massive economic loss, and protect human health and well-being.

Increased greenhouse gases are causing increased temperatures, rising sea levels, and other extreme weather events, which disrupt ecosystems and threaten biodiversity.

Biodiversity loss is closely intertwined with severe weather events, creating a feedback loop that exacerbates environmental and human health impacts. Global biodiversity decline has escalated to a crisis point, with 73 percent of wildlife lost by 2024 and one-third of all land plants threatened with extinction.[16] In the United States, a 60 percent decline in wildlife occurred in just over a generation.[17] This loss of biodiversity creates serious economic and environmental impacts that affect our nation's food supply, ecosystem services, and public and environmental health.

Landscape architects are leaders in planning and designing nature-based projects that help protect habitats and promote biodiversity. From coastal restoration, erosion control, and artificial reefs, to green roofs, reforestation, rail corridors, wildlife crossings in

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[15] Congressional Research Service (2016, May 2). *Green Infrastructure and Issues in Managing Urban Stormwater*. https://www.everycrsreport.com/files/20160502_R43131_11d97f7ac92867d8005cac811ed4ffe110071061.pdf

[16] World Wildlife Fund (2024, October 10). *WWF Living Planet Report 2024: A Planet in Crisis.* https://www.arcticwwf.org/newsroom/news/wwf-living-planet-report-2024-a-planet-in-crisis/

[17] Nature and Biodiversity (2022, October 17). *6 charts that show the state of biodiversity and nature loss—and how we can go 'nature positive.'* World Economic Forum. https://www.weforum.org/stories/2022/10/nature-loss-biodiversity-wwf/

rights-of-way, and more,[18] landscape architects have designed these projects to successfully address habitat loss. While these landscape architecture techniques help mitigate and adapt to the impacts of biodiversity loss, significantly reducing greenhouse gas emissions is paramount to preventing this catastrophe.

Once again, ASLA urges you to maintain EPA's 2009 Endangerment Finding. The science is clear that reducing greenhouse gas emissions will prevent extreme heat, severe flooding, biodiversity loss, and other catastrophic weather-related events. This will in turn protect human health, safety, and economic well-being. We urge your serious consideration.

Sincerely,

Torey Carter-Conneen, Hon. ASLA
Chief Executive Officer
American Society of Landscape Architects

ASLA Climate & Biodiversity Action Committee

[18] Park, S., Zhang, P. & Ali, Z. (2024, March). *Landscape Architecture Solutions to Biodiversity Loss.* American Society of Landscape Architects Fund. March 2024. https://www.asla.org/evidence