

September 21, 2025

To: Administrator Zeldin and U.S. Environmental Protection Agency

RE: Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards

Public Comment: **Oppose Overturning of the Endangerment Finding**

Docket ID No. EPA-HQ-OAR-2025-0194-0093

I am writing as a public health professional who for over 40 years has been engaged in research on how the environment shapes our health in profound and myriad ways. I have co-authored over 70 scientific publications related to environmental health. I have conducted research linking environmental exposures to health through my work at the California Department of Public Health and at the University of California San Francisco Program on Reproductive Health and the Environment (PRHE). I am currently a Research Collaborator at PRHE and the Chair of San Francisco Bay Physicians for Social Responsibility's (SF PSR) Environmental Health Committee. SF PSR's Environmental Health Committee members are diverse health professionals who have extensive expertise regarding the health harms experienced by their patients and communities from climate change. I am also writing as an existentially concerned grandmother aware of the substantive body of science documenting that the ecosystem that supports all life on our planet is threatened by our climate crisis and thus, we cannot assume a livable future for generations to come.

As such, I strongly oppose any effort to repeal or weaken the EPA's Endangerment Finding. EPA's proposed repeal of all greenhouse gas (GHG) emission standards is antithetical to the health and well-being of all Americans and future generations.

In 2007 the Supreme Court determined that GHGs fall within the statutory definition of an "air pollutant" under the Clean Air Act. In 2009 the EPA determined that "six greenhouse gases taken in combination endanger both the public health and the public welfare of current and future generations" and that "the combined emissions of these greenhouse gases from new motor vehicles and new motor vehicle engines contribute to the greenhouse gas air pollution that endangers public health and welfare." In 2025 the National Academy of Sciences (NAS) reviewed evidence "for whether anthropogenic emissions of greenhouse gases to the atmosphere are reasonably anticipated to endanger public health and welfare in the United States". The NAS found that relationship between climate change and GHG emissions is now overwhelmingly clear.¹

The NAS concluded:

"EPA's 2009 finding that the human-caused emissions of greenhouse gases threaten human health and welfare was accurate, has stood the test of time, and is now reinforced by even stronger evidence. Today, many of EPA's conclusions are further supported by longer observational records and multiple new lines of evidence. Moreover, research has uncovered additional risks that were not apparent in 2009."

Abrogating EPA's science-based decision-making, its veracity now further fortified by 16 additional years of scientific findings, would effectively dismantle the cornerstone of our national climate response and upend climate policy. Such action would not only be scientifically baseless, it is a cruel response to the

¹ National Academies of Sciences, Engineering, and Medicine. 2025. *Effects of Human-Caused Greenhouse Gas Emissions on U.S. Climate, Health, and Welfare*. Washington, DC: National Academies Press.
<https://doi.org/10.17226/29239>

overwhelming needs of Americans whose health and well-being are actively threatened on a daily basis by climate-fueled public health catastrophes, including wildfires, hurricanes, tornados, excessive heat, and/or other extreme weather events. These tragedies cost lives, billions of dollars, and immense suffering. Moreover, such a move by EPA would further deeply embed environmental injustice into public health policy as the health harms of our climate crisis fall disproportionately on our most vulnerable individuals and communities.²

Exemplary of the health harms of our GHG-fueled climate crisis that abrogation of the Endangerment Finding would profoundly amplify is exposure to extreme heat events. The frequency, intensity and duration of prolonged periods of excessive heat have increased and these trends are projected to worsen under enhanced global warming.³ Deaths related to exposure to heat have increased throughout much of the United States between 1981 and 2022.⁴ A 2024 review article published in the *New England Journal of Medicine* documents the health harms of exposure to extreme heat, including cardiovascular disease, i.e., stroke, congestive heart failure; kidney disease, i.e., acute renal failure; respiratory disorders, i.e., asthma, COPD exacerbations, respiratory infections; mental disorders, i.e., anxiety, suicide, mental fatigue; and adverse birth outcomes, i.e., preterm birth, low birth weight, still birth, congenital heart defects.⁵

Without stronger climate protections, heat-related illness and death will continue to rise, and cardiovascular mortality is projected to increase by up to 233% by midcentury.⁶

Workers are among the most vulnerable groups of people susceptible to the health harms of exposure to heat. A 2025 in-depth analysis of the multifaceted impacts of rising heat levels on occupational safety and health details the adverse physiological, socioeconomic and productivity-related consequences of heat stress. The report finds that “Workers in nearly every sector can be affected by increasing ambient temperatures. Outdoor workers and first responders are particularly vulnerable to heat, but indoor workers can also be at risk, particularly if they work in heat- intensive industries or perform intense physical work.”⁷

² American Lung Association. Disparities in the Impact of Air Pollution. 2023. <https://www.lung.org/clean-air/outdoors/who-is-at-risk/disparities>.

³ Perkins-Kirkpatrick SE, Lewis SC. Increasing trends in regional heatwaves. *Nat Commun*. 2020;11(1):3357. <https://doi.org/10.1038/s41467-020-16970-7>. PMID: 32620857

⁴ Narayanan A, Keellings D (2025) Rise in heat related mortality in the United States. *PLOS Clim* 4(8): e0000610. <https://doi.org/10.1371/journal.pclm.0000610>

⁵ Bell ML, Gasparrini A, Benjamin G. *Climate change, extreme heat, and health*. *N Engl J Med* 2024;390:1793-801. DOI: 10.1056/NEJMra2210769

⁶ Khatana SAM, Eberly LA, Nathan AS, Groeneveld PW. Projected Change in the Burden of Excess Cardiovascular Deaths Associated With Extreme Heat by Midcentury (2036-2065) in the Contiguous United States. *Circulation*. 2023 Nov 14;148(20):1559-1569. doi: 10.1161/CIRCULATIONAHA.123.066017. Epub 2023 Oct 30. PMID: 37901952; PMCID: PMC10840949.

⁷ World Health Organization and World Meteorological Organization, 2025. Climate change and workplace heat stress: technical report and guidance. ISBN (WHO) 978-92-4-009981-4 (electronic version) ISBN (WHO) 978-92-4-009982-1 (print version) ISBN (WMO) 978-92-63-11376-4. <https://www.who.int/publications/i/item/9789240099814>

Moreover, high temperatures can produce atmospheric conditions that trap, retain, and concentrate urban-based toxic emissions. The consequent increased exposure to pollutants increases rates of respiratory illness through the elevation of fine particulate matter (PM2.5) and ground-level ozone concentrations in the lower atmosphere. These relationships produce a feedback loop where pollution levels rise as the heat event persists.⁽³⁾

Transportation emissions alone produce 29% of U.S. GHGs and are a major source of fine particulate matter and ozone pollution.

EPA's Endangerment Finding has enabled critical protections such as vehicle and power plant emission standards that have reduced pollution, and in doing so, EPA's Endangerment Finding has saved countless lives. For example, a 2022 analysis from the American Lung Association estimates that transitioning to cleaner vehicles and energy sources would prevent 110,000 premature deaths, avoid 13 million lost workdays, and generate \$1.2 trillion in health benefits.⁸

Finally, exposure to extreme heat and concomitant air pollution are two among other countless inter-related health harms of our GHG-fueled climate emergency. The NAS's 2025 evaluation of the evidence for climate-related health harms documents a proliferation of evidence for climate-related vector-borne diseases, development or exacerbation of chronic diseases, and exposure to airborne allergens; with effects on mental health, pregnancy and birth outcomes, nutrition, immune health, antimicrobial resistance, and metabolic diseases supported by newer, unfolding streams of evidence.

EPA's 2009 Endangerment Finding concluded that *"six greenhouse gases taken in combination endanger both the public health and the public welfare of current and future generations"*. The science that has accumulated over the past 16 years has supported EPA's 2009 finding and moreover has shown that the health harms of fossil-fuel driven GHGs are even more dire.

I implore the EPA to uphold and strengthen its Endangerment Finding to protect public health, advance environmental justice, and safeguard the well-being of current and future generations.

Sincerely,



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⁸ American Lung Association. Zeroing-In on Healthy Air. A National Assessment of Health and Climate Benefits of Zero-Emission Transportation and Electricity. March 2022. Available at: <https://www.lung.org/clean-air/electric-vehicle-report/zeroing-in-on-healthy-air>.