



PHYSICIANS FOR
SOCIAL RESPONSIBILITY
SAN FRANCISCO BAY CHAPTER

September 21, 2025

RE: EPA Proposed Repeal of Endangerment Finding and Greenhouse Gas Vehicle Standards

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

I'm Dr. Robert M. Gould. After working as a Pathologist at San Jose Kaiser for over 30 years, since 2012, I've been an Adjunct Assistant Professor at UCSF School of Medicine, working with our Program on Reproductive Health and the Environment (PRHE). As a 30-year member of the Santa Clara County Medical Association (SCCMA), I've helped develop many California Medical Association (CMA) policies protective of public, environmental and occupational health, including those connected with our escalating climate emergency.

I'm writing you as President of San Francisco Bay Physicians for Social Responsibility (SF Bay PSR), representing many hundreds of health professionals throughout our region. We speak for the health of our patients and communities, who are increasingly harmed by the impacts of rapidly advancing global warming, including the extensively and irrefutably-documented health harms of air pollution, especially severe in California, home to six of the ten most ozone-polluted, or "smoggiest" cities in our nation.

As such, we strongly oppose EPA's irresponsible proposal to repeal its Endangerment Finding and its greenhouse gas standards for vehicles.

Climate change is already harming Americans' health across every region of the country. We are suffering from worsened air quality from wildfire smoke and higher ozone pollution, and increasing occurrence and severity of extreme weather events.

A 2024 review article published in the [New England Journal of Medicine](#) documents that in recent decades we have experienced an increase in the frequency, duration, and intensity of heat waves, with the annual number of heat waves now being twice that experienced in the 1980s, epitomized by the recent one broiling millions throughout our nation.

Many of our patients and communities are especially vulnerable: our children and elders, those with pre-existing health conditions, people who work outside, communities of color and of low-wealth who experience disproportionate health harms.

We need to greatly strengthen and enforce environmental standards and regulations to protect these populations.

EPA should not weaken, but strengthen our standards for cars and trucks that contribute so much particle, ozone and other toxic pollution causing or exacerbating illnesses such as asthma, COPD and

heart attacks, and often leading to costly ER visits or hospitalizations. As well, the abundant particulate matter emitted from diesel-fueled trucks is associated with an elevated risk of cancer to those living close to such emissions.

All of these aforementioned concerns have been greatly reinforced by the findings of the report released by the National Academy of Sciences on September 17, 2025. The report “[Effects of Human-Caused Greenhouse Gas Emissions on U.S. Climate, Health, and Welfare](#)” comprehensively documents the effects of human-caused greenhouse gas emissions on a wide variety of public and environmental health issues.

The five summary conclusions of the report include:

- (1) That a wide variety of human activities are increasing the concentration of greenhouse gas (GHG) emissions gases in the atmosphere, which continue to increase and which are the “primary driver” of the “observed long-term warming trend.”
- (2) That greenhouse gas emissions are “unequivocally... warming Earth’s surface and changing Earth’s climate.” The summary noted that observed trends “include increases in hot extremes and extreme single-day precipitation events, declines in cold extremes, regional shifts in annual precipitation, warming of the Earth’s oceans, a decrease in ocean pH, rising sea levels, and an increase in wildfire severity.
- (3) That greenhouse gas emissions and consequent climate change harm the health of our people in diverse ways, and that although adaptation measures can serve to help people cope with such harmful consequences, the risk of harm cannot be removed. As the report summarizes, unfolding climate change “intensifies risks to humans from exposures to extreme heat, ground-level ozone, airborne particulate matter, extreme weather events, and airborne allergens, affecting incidence of cardiovascular, respiratory, and other diseases. Climate change has increased exposure to pollutants from wildfire smoke and dust, which has been linked to adverse health effects. The increasing severity of some extreme events has contributed to injury, illness, and death in affected communities. Health impacts related to climate-sensitive infectious diseases—such as those carried by insects and in contaminated water—have increased. New evidence is developing about additional health impacts of climate change, including on mental health, nutrition, immune health, antimicrobial resistance, kidney disease, and negative pregnancy-related outcomes. Groups such as older adults, people with preexisting health conditions or multiple chronic diseases, and outdoor workers are disproportionately susceptible to climate-associated health effects. Even as non-climate factors, including adaptation measures, can help people cope with harmful impacts of climate change, they cannot remove the risk of harm.”
- (4) That human-caused greenhouse gas emissions and resultant climate change are harmful to the welfare of people in the US in many ways. As the report summary documents, “...changes in temperature and precipitation extremes and variability are leading to negative impacts on agricultural crops and livestock, even as technological and other changes have increased agricultural production. Climate change, including increases in climate variability and wildfires, is changing the community composition and function of forest and grassland ecosystems and the services they provide. Climate-related changes in water availability and quality vary across regions in the United States with some regions showing a decline. Climate-related changes in the chemistry and the heat content of the ocean

are having negative effects on calcifying organisms and contributing to increases in harmful algal blooms. U.S. energy systems, infrastructure, and many communities are experiencing increasing stress and costs owing to the effects of climate change.”

(5) That continued human-derived greenhouse gas emissions “will lead to more climate changes in the United States, with the severity of expected change increasing with every ton of greenhouse gases emitted.” It is further noted that continuing such climate changes “increase the likelihood of passing thresholds in Earth systems that could trigger tipping points or other high-impact climate surprises,” and that “... future harm to human health and welfare created by human-caused GHGs is beyond scientific dispute.” The report summary concludes with a dire warning that we in the U.S. are confronting “a future in which climate-induced harm continues to worsen and today’s extremes become tomorrow’s norms.”

In conclusion, we health professionals in SF-Bay PSR strongly believe that **EPA should do the right thing for our patients and communities.** Heed the experience of countless health providers and scientists who have provided expertise over decades to help guide policies that protect our health gravely threatened by our climate emergency. **Please reverse your plans to repudiate the well-validated science at the heart of the Endangerment Finding and related pollution standards that are critical to our survival as a species.**

Sincerely,

A handwritten signature in black ink that reads "Robert M. Gould, M.D." The signature is written in a cursive, flowing style.

Robert M. Gould, M.D,
President
San Francisco Bay Area Physicians for Social Responsibility