# **Protect the Endangerment Finding**

There are a few key ways you can take action:

- Provide your written comments <u>here</u>. Written comments are now due by September 22.
- Share this toolkit with five colleagues. The more people who submit public comments rooted in health and evidence, the more likely we are to save this rule.

## **Background**

g

The Endangerment Finding, issued by the EPA in 2009, is a cornerstone of public health and environmental protection. It legally recognized six greenhouse gases as air pollutants under the Clean Air Act, granting EPA the authority to regulate them. This foundational determination has enabled key regulations—such as vehicle emissions standards and power plant rules—to reduce climate pollution and protect human health.

Now this critical safeguard is under threat. Efforts to repeal the Endangerment Finding—most immediately through the proposed rollback of tailpipe emissions standards for light-, medium-, and heavy-duty vehicles—risk dismantling decades of science-based policy. Such a repeal would not only block EPA's ability to address climate pollution but would also accelerate harmful emissions at a time of growing climate-related health crises. Read the Consortium's statement on the proposal <a href="here">here</a>.

### Why This Matters for Health

Climate change is no longer a distant threat—it is a public health emergency happening now. Major medical journals identify climate change as the greatest threat to public health in the 21st century. Rising greenhouse gas emissions are intensifying heatwaves, wildfires, floods, and storms—each with serious and often deadly health consequences. Tailpipe emissions from the transportation sector alone account for 29% of U.S. greenhouse gas emissions and release co-pollutants such as particulate matter and ozone that damage heart and lung health.

• Climate change is a growing public health threat. It increases heat-related illness and death, worsens chronic disease outcomes, expands the spread of infectious

diseases, and intensifies mental health impacts from displacement and disaster exposure.

- Reducing emissions improves health and saves lives. A recent analysis from the <u>American Lung Association</u> 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.
- Air pollution and climate burdens are <u>not equitably distributed</u>. Communities living near fossil fuel infrastructure and highways—often low-income, Indigenous, and communities of color—are more likely to experience health harms related to pollution and climate change.

## **Evidence Supporting the Endangerment Finding**

The health threats posed by climate change are clear, well-documented, and growing:

- Extreme Heat: Extremely hot days and heat waves are becoming increasingly common and are projected to intensify. Heat causes the most weather-related deaths in the United States, and projected warming is expected to increase heat-related mortality. Cardiovascular deaths in the US alone are expected to increase by up to 233% by midcentury if we roll back pollution protections. Heat waves also result in increased risk of preterm births.
- Air Pollution: There is consistent evidence that climate change will increase
  ground-level ozone pollution (smog), which aggravates asthma and results in
  increased hospitalizations for respiratory disease. Climate change is also
  worsening wildfires. In 2023, 100 million Americans were under air quality
  advisories for wildfire smoke. Wildfire smoke exposure increases risk for dementia,
  certain types of cancer, and premature mortality.
- Extreme Weather: Heavy precipitation events and severe storms are already becoming more frequent and intense. The resulting flooding and storm surge result in lost lives and communities, <u>contaminated water systems</u>, and damaged or destroyed healthcare facilities.
- Infectious Disease and Allergies: Warmer temperatures are likely to increase the spread of food- and waterborne illnesses and vector-borne diseases like <u>dengue</u>. Climate change may also affect the prevalence and severity of allergy symptoms by <u>increasing pollen load and lengthening pollen season</u>.
- Compounded Risks: Climate-fueled disasters result in power outages, missed work days, destroyed healthcare facilities, homes, and schools. Displaced communities struggle to access the services they need to heal and rebuild. As the price tag for climate disasters grows each year, individuals and households are left paying the price with their health and lives.

### **Key Messages for Health Professionals**

• Greenhouse gases qualify as health-harming air pollution: They contribute directly to climate change and indirectly to rising rates of asthma, heart disease, heat stress, infectious disease, poor birth outcomes, and climate-related trauma.

- Rolling back the Endangerment Finding will increase public health risks. The
  overturning would lead to higher emissions, more extreme weather events, and
  greater health burdens, particularly for vulnerable populations.
- Science should guide regulatory policy. The existing finding was based on rigorous scientific review and public input. Removing them undermines evidence-based policymaking and weakens the federal government's ability to protect health.
- **Public support for clean air and climate protections is strong.** Polling consistently shows broad bipartisan support for reducing pollution and protecting communities from the health effects of climate change.

## **How to Take Action**

The proposed repeal of the Endangerment Finding threatens to reverse major public health and environmental gains. Health professionals have a critical role to play in advocating for protections that reduce emissions, improve air quality, and protect vulnerable communities.

You can use the information above to craft your written public comments. We're providing a template below that you can use as well. We encourage you to customize this letter to your personal experiences and expertise. While every public comment matters, every unique public comment adds greater heft to our collective advocacy. We have a few specialty-specific examples at the end of this document [dermatology, pediatrics, gerontology, cardiology]

Here's what makes for a strong individualized public comment:

- Lead with who you are. Your specialty, your years in practice, the community you serve.
- Offer one concise patient example (de-identified). What changed with extreme heat, wildfire smoke, flooding, or poor air quality?
- **Cite 1–2 peer-reviewed studies** that support what you see in the clinic or the hospital.
- Name the harm of repeal: weaker protections, worse air, more illness.
- **State the ask clearly**: Uphold and strengthen the Endangerment Finding.

Public Comment: Oppose Overturning of the Endangerment Finding: Docket ID No. EPA-HQ-OAR-2025-0194

Dear Administrator Zeldin and U.S. Environmental Protection Agency,

As a [name your speciality, i.e. pediatrician, oncologist, radiologist, etc.] deeply committed to the health and well-being of the community I serve in [name your location], I write to express strong opposition to efforts to repeal or weaken the EPA's Endangerment Finding.

Since its issuance in 2009, the Endangerment Finding has served as a cornerstone of the EPA's authority to regulate greenhouse gases under the Clean Air Act. It was grounded in

rigorous scientific evidence and public input, and affirmed that greenhouse gases endanger both current and future generations. This determination has enabled critical protections—such as vehicle and power plant emissions standards—that have significantly reduced climate pollution and saved lives.

Rolling back the Endangerment Finding would dismantle the very foundation of EPA's climate response, just as the health impacts of climate change are accelerating. As a frontline health professional, I see these consequences daily: patients with worsening asthma due to wildfire smoke, elderly individuals collapsing during extreme heat, and families displaced by floods and storms struggling to access care.

These impacts are not theoretical—they are real, measurable, and disproportionately borne by low-income communities and communities of color. Transportation emissions alone account for 29% of U.S. greenhouse gases and are a major source of fine particulate matter and ozone pollution, which contribute to asthma, cardiovascular disease, and premature death. In my practice, I see this play out in the following way. [Provide deidentified information about either a patient or how climate change is affecting the health of your patients on a broader scale.]

The evidence for these harms is clear. [Cite 1-2 peer-reviewed articles that support your examples above]

The American Lung Association estimates that transitioning to cleaner vehicles and energy sources could generate \$1.2 trillion in health benefits, prevent 110,000 premature deaths, and avoid 13 million lost workdays. These are not abstract numbers—they reflect the real-world gains we can achieve by protecting clean air and reducing emissions.

As Administrator of the EPA, you have a solemn responsibility to uphold the agency's mission: to protect human health and the environment. That mission must be guided by science and centered on the people most affected by pollution and climate impacts.

I urge you to defend the Endangerment Finding. Rolling it back would not only ignore decades of scientific consensus—it would strip EPA of its ability to address one of the greatest health threats of our time. Our patients, our communities, and our children are counting on your leadership.

Sincerely,
[Name]
[Professional Title / Credentials, if applicable]
[City, State]
[Email Address – optional if submitting through Regulations.gov]

# **Dermatology**

Dear Administrator Zeldin,

# 1. State your specialty and why climate change is harming the health of patients in your practice.

As a board-certified **dermatologist**, I am writing to express my deep concern over any attempt to repeal or weaken the EPA's 2009 Endangerment Finding, which affirms that greenhouse gases endanger public health and welfare. The evidence is clear: greenhouse gas emissions drive climate change, and the resulting environmental changes—along with co-emitted air pollutants—are harming the skin health of millions of Americans.

# 2. Provide case examples and stories

Many of the patients I see every week suffer from chronic inflammatory dermatoses such as atopic dermatitis and autoimmune blistering diseases like pemphigus. These conditions are exquisitely sensitive to environmental triggers.

# 3. Provide at least 1-2 high quality papers for evidence.

Fine particulate matter and other air pollutants—many of which are directly tied to fossil fuel combustion—can exacerbate disease flares, making symptoms more frequent, severe, and difficult to control (Schachtel et al., 2021; Kim et al., 2017; Koohgoli et al., 2017; Li et al., 2016; Nguyen et al., 2019; Noh et al., 2019; Ren et al., 2019; Rosenbach, 2019). Increases in greenhouse gases are also driving longer pollen seasons (Ziska et al., 2011), intensifying wildfire activity (Spracklen et al., 2009), and contributing to stagnant air events that trap pollutants near the ground (Trail et al., 2013). Each of these factors worsens skin inflammation for vulnerable patients.

# 4. Talk about what harms will come from repeal for your patients.

Repealing the Endangerment Finding would dismantle a crucial legal foundation that allows the EPA to regulate greenhouse gas emissions. Without this protection, we can expect further degradation of air quality, more extreme climate events, and an escalation in skin-related diseases—burdens that will disproportionately harm children, the elderly, and individuals with preexisting skin conditions.

#### 5. Conclusion

As physicians, our oath is to protect the health of our patients. I urge the EPA to uphold and strengthen the Endangerment Finding, ensuring that the agency retains the authority to regulate greenhouse gases and safeguard the health and well-being of all Americans, including those whose skin is their first and most vulnerable line of defense against the environment.

# Gerontology

Dear Administrator Zeldin,

# 1. State your specialty and why climate change is harming the health of patients in your practice

As a board-certified geriatrician, I am writing to express my strong opposition to any attempt to repeal or weaken the EPA's 2009 Endangerment Finding, which affirms that greenhouse gases endanger public health and welfare. The scientific evidence is unequivocal: climate change, fueled by greenhouse gas emissions, disproportionately affects the health and well-being of older adults. My patients are particularly vulnerable to heatwaves, air pollution, and extreme weather events that compound existing chronic conditions and impair functional independence.

## 2. Provide case examples and stories

In clinical practice, it is increasingly common to see older adults experiencing worsening symptoms of chronic illnesses, such as cardiovascular disease, respiratory conditions, and cognitive impairments, during periods of extreme heat, poor air quality, or climate-related disruptions like wildfires or flooding. These environmental stressors often lead to avoidable emergency room visits, hospital admissions, or declines in functional status. Many patients struggle with the compounding effects of isolation, disrupted access to care, and limited mobility during extreme weather events, all of which are becoming more frequent and severe due to climate change.

## 3. Provide at least 1–2 high-quality papers for evidence

Scientific research confirms the elevated risks climate change poses to older adults. Studies have found increased cardiovascular and respiratory mortality among seniors during heat events (Wei et al., 2024; Yazdi et al., 2022). Air pollution, especially PM2.5 from fossil fuels, is associated with increased hospital admissions and mortality in older populations (Fan & Wang, 2020; Maciejczyk et al., 2021). Moreover, climate-related disasters disrupt care and increase social isolation, risk factors for both physical and cognitive decline in aging adults.

## 4. Talk about what harms will come from repeal for your patients

Repealing the Endangerment Finding would dismantle a crucial legal framework that enables the EPA to regulate greenhouse gases. Without it, we can expect a deterioration in air quality, more extreme heat events, and intensified climate disasters, all of which would pose life-threatening risks to the older adults I care for. These harms would fall disproportionately on those with limited mobility, cognitive impairments, or socioeconomic barriers to accessing care.

#### 5. Conclusion

As a physician devoted to protecting the health of older Americans, I urge the EPA to uphold and strengthen the Endangerment Finding. Our elderly patients, many of whom have spent a lifetime contributing to society, deserve a livable environment, clean air, and a healthcare system not overwhelmed by climate-related burdens.

#### References:

Yazdi, M. D., Wei, Y., Di, Q., Requia, W. J., Shi, L., Sabath, M. B., ... & Schwartz, J. (2022). The effect of long-term exposure to air pollution and seasonal temperature on hospital admissions with cardiovascular and respiratory disease in the United States: A difference-in-differences analysis. *Science of The Total Environment*, 843, 156855.

Wei, Y., Feng, Y., Yazdi, M. D., Yin, K., Castro, E., Shtein, A., ... & Schwartz, J. D. (2024). Exposure-response associations between chronic exposure to fine particulate matter and risks of hospital admission for major cardiovascular diseases: population based cohort study. *bmj*, 384.

Fan, M., & Wang, Y. (2020). The impact of PM2. 5 on mortality in older adults: evidence from retirement of coal-fired power plants in the United States. *Environmental Health*, 19(1), 28.

Maciejczyk, P., Chen, L. C., & Thurston, G. (2021). The role of fossil fuel combustion metals in PM2. 5 air pollution health associations. *Atmosphere*, 12(9), 1086.

# **Pediatrics**

Dear Administrator Zeldin,

# 1. State your specialty and why climate change is harming the health of patients in your practice

As a board-certified pediatrician, I am writing to express my deep concern over any effort to repeal or weaken the EPA's 2009 Endangerment Finding, which correctly identifies greenhouse gases as a threat to public health and welfare. Children are particularly susceptible to the harmful effects of climate change due to their developing bodies, faster respiratory rates, and greater exposure to environmental conditions. In my practice, I see firsthand how climate-related factors are already harming children's health.

# 2. Provide case examples and stories

Pediatricians across the country are observing a growing number of children affected by climate-related health issues. Climate-driven air pollution regularly triggers asthma attacks and respiratory distress in children, particularly in urban and underserved communities. Behavioral health concerns, including anxiety, sleep disruption, and post-traumatic stress, are increasingly reported following exposure to disasters such as wildfires, floods, and storms. These climate stressors also interfere with children's learning, physical development, and overall well-being.

# 3. Provide at least 1-2 high-quality papers for evidence

There is robust scientific evidence demonstrating the impact of climate change on children's health. Studies link fossil fuel-related air pollution to increased asthma incidence and severity in children (Perera & Nadeau, 2022; Esposito et al., 2014). Additionally, research shows that heat-related illnesses are rising among children, especially during prolonged heat waves

(Schapiro et al., 2024). Climate change has also been associated with a growing mental health burden in children exposed to environmental disasters (Poulx et al., 2024).

# 4. Talk about what harms will come from repeal for your patients

If the Endangerment Finding is repealed, the EPA will lose its legal authority to regulate greenhouse gases, opening the door to higher levels of pollution, worsening climate change, and increased health risks for children. These harms will not be distributed evenly: children in low-income communities and communities of color will suffer disproportionately from increased asthma, heat-related illness, and trauma.

#### 5. Conclusion

As pediatricians, we have a moral and professional responsibility to protect children, who are the least responsible for climate change yet bear the greatest burden of its consequences. I urge the EPA to uphold the Endangerment Finding and maintain its authority to limit greenhouse gas emissions. Our children's health, and their future, depend on it.

#### **References:**

Esposito, S., Tenconi, R., Lelii, M., Preti, V., Nazzari, E., Consolo, S., & Patria, M. F. (2014). Possible molecular mechanisms linking air pollution and asthma in children. *BMC pulmonary medicine*, 14(1), 31.

Perera, F., & Nadeau, K. (2022). Climate change, fossil-fuel pollution, and children's health. *New England Journal of Medicine*, *386*(24), 2303-2314.

Schapiro, L. H., McShane, M. A., Marwah, H. K., Callaghan, M. E., & Neudecker, M. L. (2024). Impact of extreme heat and heatwaves on children's health: a scoping review. *The Journal of Climate Change and Health*, 19, 100335.

Proulx, K., Daelmans, B., Baltag, V., & Banati, P. (2024). Climate change impacts on child and adolescent health and well-being: A narrative review. *Journal of global health*, 14, 04061.

# Cardiology

Dear Administrator Zeldin,

# 1. State your specialty and why climate change is harming the health of patients in your practice

As a board-certified cardiologist, I am writing to voice my opposition to any attempt to repeal or weaken the EPA's 2009 Endangerment Finding, which rightly affirms that greenhouse gases are a

danger to public health. Climate change is not a distant threat for those with cardiovascular disease, it is a present and growing crisis. Elevated temperatures and air pollution, both worsened by fossil fuel emissions, are directly contributing to heart attacks, strokes, arrhythmias, and sudden cardiac death.

# 2. Provide case examples and stories

Patients with cardiovascular disease are increasingly presenting with complications that align with environmental stressors driven by climate change. Periods of extreme heat often coincide with spikes in emergency visits for chest pain, arrhythmias, or fluid overload in heart failure patients. Similarly, days with high air pollution levels are associated with increased cardiac events and hospitalizations. These patterns are now familiar to many cardiology providers, who see how climate-related conditions exacerbate preexisting disease and complicate recovery.

# 3. Provide at least 1–2 high-quality papers for evidence

Extensive research supports these clinical observations. Fine particulate matter (PM2.5) exposure is closely associated with increased risk of myocardial infarction, heart failure, arrhythmias, and stroke (Rajagopalan & Landrigan, 2021; Montone et al., 2023). Extreme heat events, which are becoming more frequent and severe due to climate change, significantly increase cardiovascular morbidity and mortality (Sejo et al., 2024; Khatana et al., 2022). These trends represent a serious public health challenge that will only worsen if emissions continue unchecked.

# 4. Talk about what harms will come from repeal for your patients

Repealing the Endangerment Finding would strip away the EPA's ability to regulate climate pollutants and protect the public from their downstream health impacts. Without these protections, we will see more heat-related cardiac events, more emergency visits and hospitalizations, and more deaths from cardiovascular disease, particularly in already burdened populations, including low-income communities, the elderly, and people with preexisting heart conditions.

#### 5. Conclusion

As cardiologists, our mission is to prevent and treat heart disease—and that increasingly requires confronting the health impacts of climate change. I urge the EPA to uphold and strengthen the Endangerment Finding. Preserving this legal foundation is vital to reducing cardiovascular disease and saving lives.

#### **References:**

Rajagopalan, S., & Landrigan, P. J. (2021). Pollution and the heart. *New England Journal of Medicine*, 385(20), 1881-1892.

Montone, R. A., Rinaldi, R., Bonanni, A., Severino, A., Pedicino, D., Crea, F., & Liuzzo, G. (2023). Impact of air pollution on ischemic heart disease: evidence, mechanisms, clinical perspectives. *Atherosclerosis*, *366*, 22-31.

Sejo, C., Mehta, N., Wilairat, S., Barry, M., Odden, M. C., & Chang, A. Y. (2024). Extreme heat and cardiovascular mortality among structurally marginalized populations in the United States: A scoping review. *The Journal of Climate Change and Health*, 20, 100343.

Khatana, S. A. M., Werner, R. M., & Groeneveld, P. W. (2022). Association of extreme heat and cardiovascular mortality in the United States: a county-level longitudinal analysis from 2008 to 2017. *Circulation*, 146(3), 249-261.

#### **Action Alert Text:**

The Trump administration, in an attempt to topple decades of protective climate and public health policies, is seeking to overturn the Endangerment Finding. The EPA issued this finding in 2009 after a rigorous public comment period and scientific review, which concluded that the buildup of greenhouse gases contributes to global warming and that these pollutants harm public health and welfare.

The Endangerment Finding requires EPA to regulate these pollutants under the Clean Air Act and has formed the bedrock of important greenhouse gas regulations. Now, the EPA is looking to roll back this finding. As health professionals, we know this science is settled.

It's essential that we tell EPA to protect the Endangerment Finding. Submit your comment now to protect this vital regulation.