



**AMERICAN
PSYCHOLOGICAL
ASSOCIATION**

September 22, 2025

Lee Zeldin, Administrator
U.S. Environmental Protection Agency
William J. Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

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

Dear Administrator Zeldin:

On behalf of the American Psychological Association Services Inc. (APA Services), the companion organization of the American Psychological Association (APA), I am writing to share comments on your agency's proposed rule repealing all greenhouse gas emission standards for new cars, light-duty trucks, and medium-duty and heavy-duty vehicles, and rescinding its earlier finding that such emissions contribute to air pollution which may endanger public health or welfare. Climate change is harming Americans' mental health by disrupting supportive conditions and triggering emotional distress. Exposure to extreme weather events—like floods, wildfires, and hurricanes—is consistently linked to increased rates of PTSD and depression.

APA is the largest scientific and professional organization representing psychology in the United States, with a membership of over 173,000 clinicians, researchers, educators, consultants, and students. APA's mission is to promote the advancement, communication, and application of psychological science and knowledge to benefit society and improve lives.

We join a host of national healthcare organizations in opposing this proposal, which is contradicted by an overwhelming body of scientific research on both the causes and consequences of climate change, and the associated impacts on human health. We are concerned that despite the fact that this body of research has grown significantly stronger in the sixteen years since EPA issued the 2009 endangerment finding, the proposed rule relies upon a noncollaborative and closed process, without interagency review or consultation with the hundreds of climate experts at the National Oceanic and Atmospheric Administration, the National Aeronautics and Space Administration, within EPA, or the National Academies of Science, Engineering, and Medicine (NASEM). In fact, the National Academies has issued a report¹ concluding that the EPA's 2009 endangerment finding "was accurate, has stood the test of time, and is now reinforced by even stronger evidence."²

¹ <https://nap.nationalacademies.org/29239>

² <https://www.nationalacademies.org/news/2025/09/national-academies-publish-new-report-reviewing-evidence-for-greenhouse-gas-emissions-and-u-s-climate-health-and-welfare>

This body of evidence shows that climate change is harming Americans' mental health through multiple pathways by disrupting the conditions known to support good mental health, triggering emotional responses including grief, depression, anger, anxiety, and trauma.^{3,4,5,6} Research consistently shows that exposure to extreme weather events including floods, wildfires, and hurricanes contributes to incidence of post-traumatic stress symptoms (PTSS) and depression. It is considered likely that more disaster survivors experience psychological distress than physical harm, and the psychological consequences can extend long after extreme events, as survivors grapple with substantial personal resource losses.^{7,8} Importantly, for at least PTSD and depression, these impacts fall unequally, and hit hardest among those with prior exposure to traumatic events, reduced social, economic, and psychological resources, individuals with pre-existing mental disorders, and women.^{9,10}

One key question is whether individuals can be expected to regain resilience in the aftermath of a natural disaster, or rather, that the risk of trauma symptoms and similar impacts can accumulate; research suggests the latter. A longitudinal study of Florida residents surveyed three times over a 2-year period before and after Hurricanes Irma and Michael (in 2017 and 2018, respectively) found that PTSS related to Hurricane Irma, such as through property loss and/or injury, was associated with greater Hurricane Michael-related PTSS and functional impairment.¹¹ Similarly, Texas residents who went through Hurricane Harvey who reported previous disaster exposure and current property damage were more likely to fall into high post-traumatic stress symptom categories than those with no previous disaster exposure or limited property damage.¹²

In addition to worsening mental health by contributing to more frequent and intense extreme weather events, research shows that climate change is also having an effect by increasing temperatures. A nationwide study of emergency department (ED) visits among adults with commercial and Medicare Advantage health insurance found that days of extreme heat were associated with higher rates of ED visits for an array of mental and behavioral health disorders.¹³ Connections have also been found between extreme heat and domestic violence, and between hot weather and

³ Clayton, S., Manning, C.M., Speiser, M., & Hill, A.N. (2021). *Mental Health and Our Changing Climate: Impacts, Inequities, Responses*. Washington, D.C.: American Psychological Association, and ecoAmerica.

⁴ Cunsolo, A., Harper, S. L., Minor, K., Hayes, K., Williams, K. G., & Howard, C. (2020). Ecological grief and anxiety: the start of a healthy response to climate change?. *The Lancet Planetary Health*, 4(7), e261-e263.

⁵ Gregersen, T., Andersen, G., & Tvinnereim, E. (2023). The strength and content of climate anger. *Global Environmental Change*, 82, 102738.

⁶ Lawrance, E. L., Thompson, R., Newberry Le Vay, J., Page, L., & Jennings, N. (2022). The impact of climate change on mental health and emotional wellbeing: a narrative review of current evidence, and its implications. *International Review of Psychiatry*, 34(5), 443-498.

⁷ Norris, F. H., Friedman, M. J., Watson, P. J., Byrne, C. M., Diaz, E., & Kaniasty, K. (2002). 60,000 disaster victims speak: Part I. An empirical review of the empirical literature, 1981—2001. *Psychiatry*, 65(3), 207-239.

⁸ Schultz, J. M., Espinel, Z., Galea, S., & Reissman, D. (2007). Disaster ecology: implications for disaster psychiatry.

⁹ Fitzpatrick, K. M. (2021). Post-traumatic stress symptomatology and displacement among Hurricane Harvey survivors. *Social Science & Medicine*, 270, 113634.

¹⁰ Lowe, S. R., Bonumwezi, J. L., Valdespino-Hayden, Z., & Galea, S. (2019). Posttraumatic stress and depression in the aftermath of environmental disasters: a review of quantitative studies published in 2018. *Current environmental health reports*, 6(4), 344-360.

¹¹ Garfin, D. R., Thompson, R. R., Holman, E. A., Wong-Parodi, G., & Silver, R. C. (2022). Association between repeated exposure to hurricanes and mental health in a representative sample of Florida residents. *JAMA network open*, 5(6), e2217251-e2217251.

¹² Fitzpatrick, 2021.

¹³ Nori-Sarma, A., Sun, S., Sun, Y., Spangler, K. R., Oblath, R., Galea, S., ... & Wellenius, G. A. (2022). Association between ambient heat and risk of emergency department visits for mental health among US adults, 2010 to 2019. *JAMA psychiatry*, 79(4), 341-349.

suicide.^{14,15,16,17} Less lethally, research shows that heat stress reduces productivity by decreasing workers' task focus and concentration, increasing error rates and the risk of occupational accidents.¹⁸ A recent meta-analysis of the effects of temperature on work performance in the typical office environment concluded that exposure to even moderately raised temperatures significantly reduced cognitive performance.¹⁹

Finally, climate change is a growing source of anxiety for millions of Americans, even if they have not directly experienced a hurricane, flood, drought, or wildfire. It is critical to avoid pathologizing climate-related anxiety; anxiety is a rational, adaptive threat response, and the evidence of the damage climate change is causing is steadily mounting. Generally, however, anxiety that is difficult to control and interferes with a person's ability to function should be addressed by a mental health professional.²⁰ According to the data released by the Yale Program on Climate Change Communication, almost two-thirds of American are either very or moderately worried about climate change, roughly the same proportion as are concerned about crime.²¹

Research has found that youth between the ages of 16 and 25 are experiencing widespread distress about climate change, with 58% reporting being either very or extremely worried, and 38% indicating that their feelings about climate change negatively affect their daily life.²² More than half of Republican-identifying youth reported feeling anxious about climate change, and across all three political affiliations (Democrat, Independent or Other, Republican), at least 69% said they wanted the U.S. government to carry out a plan to prevent the worst impacts of climate change. This is a legitimate request; peer-reviewed research released earlier this year projects that children born in 2020 will face two to seven times more extreme climate events over their lifetime than those born in 1960.²³

The proposal to rescind the 2009 greenhouse gas endangerment finding is directly contradicted by the overwhelming body of evidence and research on climate change and its causes, and ignores the damage it is inflicting on the mental health and well-being of individuals and communities across the U.S. Carbon dioxide and other greenhouse gases clearly fall within the Clean Air Act's definition of air pollutants (at 42 USC § 7602(g)), and EPA is legally obligated to prescribe standards for the emission of any air pollutants from motor vehicle engines that may reasonably be anticipated to endanger public health or welfare.

¹⁴ Dey, A. K., Rao, N., Thomas, E. E., Ma, Y., Riley, G., Benmarhnia, T., & Raj, A. (2025). Extreme Heat and Calls to Law Enforcement Related to Domestic Violence. *JAMA Network Open*, 8(8), e2530530-e2530530.

¹⁵ Rizzotto, J. S., Sims, K. M., & Gibbs, H. K. (2025). Hot tempers: Differential effects of heat and drought on domestic violence. *Review of Economics of the Household*, 1-26.

¹⁶ Liu, J., Varghese, B. M., Hansen, A., Xiang, J., Zhang, Y., Dear, K., ... & Bi, P. (2021). Is there an association between hot weather and poor mental health outcomes? A systematic review and meta-analysis. *Environment international*, 153, 106533.

¹⁷ Cloud, D. H., Williams, B., Haardörfer, R., Brinkley-Rubinstein, L., & Cooper, H. L. (2023). Extreme heat and suicide watch incidents among incarcerated men. *JAMA network open*, 6(8), e2328380-e2328380.

¹⁸ Mazlomi, A., Golbabaie, F., Farhang Dehghan, S., Abbasinia, M., Mahmoud Khani, S., Ansari, M., & Hosseini, M. (2017). The influence of occupational heat exposure on cognitive performance and blood level of stress hormones: A field study report. *International journal of occupational safety and ergonomics*, 23(3), 431-439.

¹⁹ Lin, X., Guo, C., Wargocki, P., Tanabe, S. I., Tham, K. W., & Lan, L. (2024). The effects of temperature on work performance in the typical office environment: a meta-analysis of the current evidence. *Building and Environment*, 112488.

²⁰ Clayton, S. (2020). Climate anxiety: Psychological responses to climate change. *Journal of anxiety disorders*, 74, 102263.

²¹ <https://climatecommunication.yale.edu/publications/top-public-worries-in-the-u-s/>

²² Lewandowski, R. E., Clayton, S. D., Olbrich, L., Sakshaug, J. W., Wray, B., Schwartz, S. E., ... & Van Susteren, L. (2024). Climate emotions, thoughts, and plans among US adolescents and young adults: a cross-sectional descriptive survey and analysis by political party identification and self-reported exposure to severe weather events. *The Lancet Planetary Health*, 8(11), e879-e893.

²³ Grant, L., Vanderkelen, I., Gudmundsson, L., Fischer, E., Seneviratne, S. I., & Thiery, W. (2025). Global emergence of unprecedented lifetime exposure to climate extremes. *Nature*, 641(8062), 374-379.

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We strongly urge EPA to withdraw its proposal to avoid increasing the risk of severe mental health consequences for the current generation and generations to come.

Sincerely,

A handwritten signature in black ink, appearing to read "Kath B McGuire", with a long horizontal flourish extending to the right.

Katherine B. McGuire, MSc
Chief Advocacy Officer