

A NEW DEAL FOR YOUTH

Substance Abuse and Mental Health Services Administration

5600 Fishers Lane
Rockville, MD 20857

RE: Request for Information: SAMHSA's Role in Possible Agency Actions Regarding Mental Health and Substance Use Wellbeing in the Context of Climate Change and Health Equity

Dear Assistant Secretary Miriam E. Delphin-Rittmon,

Thank you for the opportunity to submit responses to the **Request for Information: SAMHSA's Role in Possible Agency Actions Regarding Mental Health and Substance Use Wellbeing in the Context of Climate Change and Health Equity**. The Center for Law and Social Policy (CLASP) and A New Deal for Youth are pleased to provide comments to SAMHSA's request for input from members of the public about how it can best address the behavioral health impacts of climate change and health equity considerations.

CLASP is a national, nonpartisan anti-poverty nonprofit based in Washington, D.C., advancing policy solutions for people living in low-income households. CLASP strives to reduce poverty, promote economic security, and advance racial equity. We work at federal, state, and local levels, supporting policy and practice that impacts people living in conditions of poverty. A New Deal for Youth is a youth-led, youth-centered effort advocating for the creation of new systems, policies, investments, and structures that reimagine life for young people in America. Environmental Justice and Healing and Wellbeing are two of our core issues areas.

Environmental justice is rooted in acknowledging the disproportionate environmental burden that marginalized communities bear, including but not limited to the harmful effects of climate change, urban planning, and the desecration of sacred land. Environmental justice is an intersectional issue area, dealing with social, racial, and economic inequities, revealing the need to work towards the just distribution of decision-making and resources to foster authentic community-oriented solutions. Additionally, environmental justice assumes the necessity of giving land back to Indigenous Peoples. To achieve environmental justice, we demand access to healing-centered, culturally responsive physical and mental health care that responds to the health impacts of climate change, ensuring that new policies don't create or exacerbate health inequities.

The climate crisis is exacerbating young people's mental health challenges. Environmental degradation has both physical and mental health impacts for young people living in frontline communities. Further, the government's failure to take meaningful action to combat the climate crisis fuels climate anxiety among young people. As the climate crisis intensifies, young people's mental health will continue to worsen. We must divest from the systems and policies fueling the climate crisis and make meaningful

A NEW DEAL FOR YOUTH

investments in protecting our environment. Any investments in mental health resources for young people must acknowledge and respond to the health impacts of climate change.

Disproportionate Impacts:

A recent study found that around 90 percent of young people nationally reported feeling some level of worry about climate change, with over 40 percent feeling very or extremely worried.¹ Indigenous young people are particularly impacted by climate change and the associated mental health impacts. The mental health concerns of Indigenous young people have been amplified by disruptions to place, migration, and intergenerational trauma. Colonial-induced environmental changes have impacted the ecological systems that supported Indigenous people's culture, health, economies, and self-determination. Climate change is compounding emotions tied to historical and ongoing disempowerment and displacement.² Therefore, A New Deal for Youth demands Indigenous self-determination and recognizes the necessity of self-determination for Indigenous young people's mental health.

Behavioral Health Access and Equity:

B. What should SAMHSA's top priorities be to ensure behavioral health equity with respect to climate change?

To kick off Mental Health Awareness Month this past May, the Biden-Harris Administration released a proclamation that called attention to the youth mental health crisis. While the administration has acknowledged the structural barriers that impact young people's mental health, its policy focus centers the role social media plays in harming youth mental health.³ The Biden-Harris Administration must expand its focus and do more to advance policies that address structural barriers impacting youth mental health.

Climate stress is not equitably felt, with communities of color and communities with low incomes at greater risk of experiencing climate-related disasters. For people of color and people living with low incomes who are already facing ambient anxiety from racism, colonialism, and poverty, climate change compounds existing stress. These factors are likely to increase the risk of developing mental health

¹ Hickman et al., "Climate anxiety in children and young people and their beliefs about government responses to climate change: a global survey", *Lancet Planet Health* 2021, <https://www.thelancet.com/action/showPdf?pii=S2542-5196%2821%2900278-3>

² <https://www.youtube.com/watch?v=qokfNVyeTYQ>

³ "A Proclamation on National Mental Health Awareness Month, 2022" <https://www.whitehouse.gov/briefing-room/presidential-actions/2022/04/29/a-proclamation-on-national-mental-health-awareness-month-2022/#:~:text=BIDEN%20JR.%2C%20President%20of%20the,National%20Mental%20Health%20Awareness%20Month.>

A NEW DEAL FOR YOUTH

problems, particularly in children and young people, who often face multiple life stressors without having the power to reduce, prevent, or avoid such stressors.

The same survey found that U.S. young people felt their government was failing young people across the world by not doing enough to avoid climate catastrophe. This governmental inaction on climate change further harms young people's mental health, with the researchers concluding, "to protect the mental health and wellbeing of young people, those in power can act to reduce stress and distress by recognizing, understanding, and validating the fears and pain of young people, acknowledging their rights, and placing them at the center of policymaking."

Equitably and effectively tackling the youth mental health crisis requires addressing the underlying structural factors—such as racism, poverty, and climate change—that harm young people's mental health. Young people rightly feel anxious, angry, scared, and sad by climate catastrophes, let alone rising hate crimes, racial violence, economic injustices, and the overall lack of safety in their communities, in this country, and on this planet.

J. How can SAMHSA support access to behavioral health and climate change resources and supports for future generations?

Historic and modern-day policies rooted in discrimination and oppression have created and widened harmful inequities impacting many communities of color. Effectively and equitably addressing mental health requires intervening at systemic and policy levels to dismantle the structures that produce negative outcomes like generational poverty, intergenerational and cultural trauma, racism, sexism, and ableism. Therefore, to equitably address the behavioral health impacts of climate change, SAMHSA must work towards environmental justice.

An individual's mental health is impacted by and informs nearly every aspect of their life, identity, and community. To improve mental health outcomes, we must think about an individual and family's economic security, family support, and their community's built environment. Climate change is negatively impacting economic security and built environment, as well as leading to displacement and disconnection among communities, which all exacerbate mental health concerns.⁴

In addition to being trauma-informed, healing-centered, youth-friendly, and culturally responsive, mental health practices should also be climate-aware. To equitably reach young people, climate-aware mental health care should be available in spaces that are meaningful to young people, including schools, virtual, and community-based services. We must also change the way we think about mental health to be broader, recognizing that art, music, nature, spirituality, and organizing are as much of a part of

⁴ Priya Pandey and Kayla Tawa, "Why Addressing Climate Change is Critical to Addressing Poverty", Center for Law and Social Policy (CLASP), April 2022, <https://www.clasp.org/blog/why-addressing-climate-change-is-critical-to-addressing-poverty/>

A NEW DEAL FOR YOUTH

healing as clinical treatment. Access to nature has been shown to improve young people's mental health, particularly as it relates to climate stress.⁵ All young people deserve access to clean air and water, and green spaces in their communities.

Policymakers should recognize that the mental health impacts of climate change are real, rational, and immediate. Young people are rightly anxious about climate change and mental health supports should acknowledge that.

Climate change and climate disasters exacerbate many of the barriers to mental health care young people already face. Many young people live in mental health deserts and cannot access care in their communities. Climate disasters can further disrupt community infrastructure, putting mental health care even further out of reach. For many young people, connection to their community is integral to their mental health. Climate disasters lead to displacement and disruption of community cohesiveness. Particularly for Indigenous young people, being on their land can support their mental health, compounding the trauma of displacement.⁶

To address these problems, SAMHSA should focus on providing seamless and automatic access to mental health care in the wake of climate disasters, with a focus on care that connects young people to their community. SAMHSA should focus on providing on-site mental health care in FEMA resource centers to address immediate mental health needs and should plan for providing ongoing care once FEMA leaves. All care should be free.

For all climate-related care, multiple treatment options should be available, including culturally derived and Indigenous healing practices. SAMHSA and other agencies should recognize Indigenous systems of knowledge and understand the connection between caring for the land and community wellbeing. One example of this is Indigenous fire stewardship, which can improve the health of both the land and the community.⁷

Policymakers must also recognize the role of protest and advocacy in young people's mental health. Young people should be actively and authentically engaged in climate change solutions, particularly Indigenous young people and young people living in frontline communities.

⁵ Dillman-Hasso, N. The nature buffer: the missing link in climate change and mental health research. *J Environ Stud Sci* 11, 696–701 (2021). <https://doi.org/10.1007/s13412-021-00669-2>

⁶ Walsh, R., Danto, D. & Sommerfeld, J. Land-Based Intervention: a Qualitative Study of the Knowledge and Practices Associated with One Approach to Mental Health in a Cree Community. *Int J Ment Health Addiction* 18, 207–221 (2020). <https://doi.org/10.1007/s11469-018-9996-3>

⁷ United States Department of Agriculture and Natural Resources Conservation Service, "Indigenous Stewardship Methods and NRCS Conservation Practices" August 2010, <https://efotg.sc.egov.usda.gov/references/public/va/IndigenousStewardship.pdf>

A NEW DEAL FOR YOUTH

Authentic Youth and Community Engagement

C. Which population(s) are most vulnerable to the behavioral health impact(s) of climate change? How can SAMHSA communicate with such population(s) and others to support their preparedness for the behavioral health impact(s) of climate change?

For centuries, Black and brown communities have been plagued and continue to be plagued by environmental racism. Black and brown communities are exposed to higher levels of air, noise, and water pollution and toxic substances such as lead, industrial chemicals, poisonous heavy metals, and pathogens.⁸ These communities are also more affected by natural disasters such as hurricanes, tornadoes, and wildfires, which are made worse by climate change.⁹

These communities experience environmental racism not by coincidence, but by design – industries often target minority and low-income neighborhoods for environmentally hazardous infrastructure, including hazardous waste facilities and pipelines. These communities are deemed “the path of least resistance.”

Exposure to increased levels of toxins and pollution contributes to health inequities. For example, air pollutants can often lead to hypertension, heart disease, deterioration of the immune system, asthma, diabetes, and mental health challenges. These communities also often lack reliable and affordable access to hospitals and health care, further exacerbating health inequities. Just in the last year, the world endured a pandemic, resulting in more than 600,000 deaths in the United States, with people of color accounting for more than half of those deaths.¹⁰ Studies show that Black people are 1.9 times more likely to die than white people, Latino and Hispanic people 2.3 times more likely, and Native American and Alaskan native 2.4 times more likely to die than white people.¹¹ While there is still so

⁸ Johnston J, Cushing L. Chemical Exposures, Health, and Environmental Justice in Communities Living on the Fenceline of Industry. *Curr Environ Health Rep.* 2020 Mar;7(1):48-57. doi: 10.1007/s40572-020-00263-8. PMID: 31970715; PMCID: PMC7035204.

⁹ Casey Berkowitz, “Environmental Racism Has Left Black Communities Especially Vulnerable to COVID-19”, The Century Foundation, May 2020, <https://tcf.org/content/commentary/environmental-racism-left-black-communities-especially-vulnerable-covid-19/?agreed=1&session=1>

¹⁰ <https://www.cdc.gov/coronavirus/2019-ncov/covid-data/investigations-discovery/hospitalization-death-by-race-ethnicity.html>

¹¹ Wu et al. “ Exposure to air pollution and COVID-19 mortality in the United States: A nationwide cross-sectional study” *Science Advances*, April 2020, <https://www.medrxiv.org/content/10.1101/2020.04.05.20054502v2>

A NEW DEAL FOR YOUTH

much to learn about Covid-19, many knew early on those people with preexisting health conditions were more likely to die.

Climate change is also a contributing factor to severe mental health conditions, such as anxiety, depression, post-traumatic stress disorder, and substance use disorders. As more people across the country continue to experience extreme weather conditions, it amplifies and exacerbates their stress levels and leads to more serious mental health symptoms. As climate change continues to worsen, more people will have to migrate to other parts of the world or country to stay safe which can lead to grief and a sense of loss.

Centering the experiences of impacted people is critical to addressing the problem at hand. When policymakers fail to center lived experience, they misdiagnose problems and create harmful solutions, feeding a cycle of more problems. This cycle is playing out now with climate change, environmental racism, and youth mental health. Young people have clearly named the root causes of their mental health challenges as systemic and now is the time for the government to act. Some ways that SAMHSA can support impacted populations is:

- Authentically consult feedback from Indigenous communities and other communities that have been disproportionately impacted by climate change before releasing a new disclosure document by creating an advisory board composed of impacted community members, including Tribal leaders, environmental justice advocates, young people living in frontline communities, and workers earning low wages. All advisory board members should be compensated for their time and lived experience and their suggestions should be listened to and implemented with fidelity.
- Increase access to access to healing-centered, culturally responsive physical and mental health care that responds to the health impacts of climate change, ensuring that new policies don't create or exacerbate health inequities.
- Center Indigenous systems of knowledge, recognizing Indigenous communities as the original stewards of this land.

K. How can SAMHSA effectively collaborate with governmental and non-governmental partners to facilitate adaption to current and future climate change impacts?

SAMHSA must actively and authentically engage young people, particularly Indigenous young people and young people living in frontline communities, when developing policies focused on climate change and behavioral health. Some steps SAMHSA can take to engage young people authentically are:

A NEW DEAL FOR YOUTH

- The creation of new decision-making structures that shifts power to Indigenous and other marginalized communities by ending racial capitalism and holding corporations accountable.
- Access to healing centered, culturally responsive physical and mental health care that responds to the health impacts of climate change, ensuring that new policies don't create or exacerbate health inequities.
- Encourage disaggregated data to better understand which communities are being disproportionately harmed by climate change
- Meeting the demands of the most impacted communities by adopting proposals these communities have created—like the Red Deal and the 17 principles of Environmental Justice—and authentically engaging them through design and implementation of policy solutions.
- Providing mental health services that address intergenerational trauma and health inequities by providing trauma-informed, healing-centered, and culturally responsive mental health services and supports.

Conclusion

As a country, we have always struggled with taking responsibility for the oppressive harm we create in society. SAMHSA can create policy solutions that address the oppressive systems contributing to the youth mental health crisis and make bold moves to ensure a safe and hospitable planet. Improving the lives of marginalized people in both economic and human health is vital to alleviating the harm that the climate crisis poses to these communities. We must act now in combating the agents of climate change and work to uplift all communities to create a healthier planet and an equitable society. If you have any additional questions about our responses or about New Deal for Youth please reach out to Kayla Tawa ktawa@clasp.org or Priya Pandey ppandey@clasp.org

Best,

New Deal for Youth Changemakers