Concerned Scientists

September 2, 2025

To: Secretary Chris Wright

Docket ID No. DOE-HQ-2025-0207

Comments on the draft report produced by DOE's Climate Working Group (CWG), titled "A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate" (CWG Report). 90 FR 36150, August 1, 2025. Notice. Department of Energy.

U.S. Department of Energy, docket number DOE-HQ-2025-0207. U.S. Department of Energy, 1000 Independence Avenue SW, Washington, DC 20585.

Submitted directly to Regulations.gov

Secretary Wright:

We write on behalf of the Union of Concerned Scientists (UCS) and our half million supporters and network of over 21,000 scientists to express our strong opposition to the deeply flawed, antiscience content of the Department of Energy (DOE)-commissioned report titled "A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate" (CWG report). UCS also vigorously opposes the profoundly inappropriate and unscientific process relied upon to generate this report. UCS puts rigorous, independent science to work to solve our planet's most pressing problems. We have long supported the use of the best available climate science to help guide policymaking to address the climate crisis. This report is the exact opposite of that and must be immediately retracted.

The CWG report contains demonstrably false statements, relies heavily on cherry-picked data to prop up incorrect conclusions, and actively employs deceptive framing to downplay the severity of climate change harms. Further, the DOE has violated the Federal Advisory Committee Act (FACA) in commissioning this report in secret, selectively hand-picking a biased group of climate contrarians to write it, and keeping the proceedings of the CWG hidden from the public. UCS has jointly filed a lawsuit with the Environmental Defense Fund (EDF) to seek a declaration that the process used to draft this report was and is unlawful and to block the report's use in agency actions including repealing the Endangerment Finding and the vehicle emission standards.¹

It is a staggering affront to the public to see such a flawed product put forward as an official U.S. Government document. To have it used to justify even worse actions, including as a basis for the

¹ Environmental Defense Fund and Union of Concerned Scientists v. Christopher Wright in his official capacity as Secretary of Energy, US DOE; Lee Zeldin in his official capacity as Administrator of the U.S. EPA, US EPA; Climate Working Group. Case 1:25-cv-12249, in the United States District Court for the District of Massachusetts. https://library.edf.org/AssetLink/0kdlw6oq5v8hsvj152eqx01b0qn74uuq.pdf

Environmental Protection Agency (EPA) to evade its legal obligation to protect the public from the health harms of climate change, is even more egregious. We take strong exception to the EPA's proposal to repeal the 2009 Endangerment Finding, including its reliance on an earlier version of this error-filled CWG report as a basis for that harmful action.²

There have been a number of initiatives by scientists and journalists to carefully document and debunk the numerous erroneous and deceptive arguments in the CWG report .^{3,4,5,6,7,8}In many cases, scientists whose work was cited in the report have spoken up to detail how their research findings were deliberately manipulated and mischaracterized, to the point where some of the findings listed in the DOE report were exactly the opposite of the actual research findings. This level of blatant scientific malpractice is shocking to see in an official U.S. government report.

The administration has ready access to the best available science, for example, via the U.S. National Climate Assessments, the assessment reports of the Intergovernmental Panel on Climate Change (IPCC), and numerous reports from the National Academies of Sciences, among other authoritative sources. 9, 10,11,12 Career scientists at federal agencies, including at the EPA and DOE,

² EPA, 2025. Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards. https://www.govinfo.gov/content/pkg/FR-2025-08-01/pdf/2025-14572.pdf

³ American Meteorological Society (AMS). 2025. *The practice and assessment of science: Five foundational flaws in the Department of Energy's 2025 climate report.*

 $[\]frac{https://www.ametsoc.org/ams/about-ams/ams-statements/statements-of-the-ams-in-force/the-practice-and-assessment-of-science-five-foundational-flaws-in-the-department-of-energys-2025-climate-report}{}$

⁴ Borenstein S. and M. Phillis, 2025. https://apnews.com/article/climate-change-epa-trump-science-takeaways-023c3725de70dfa947cfee4f28ce24e3

⁵ Tandon et. al. 2025. Factcheck: Trump's climate report includes more than 100 false or misleading claims. https://interactive.carbonbrief.org/doe-factcheck/index.html

⁶ Dessler, A.E. (Ed.). 2025. *Climate Experts' Review of the DOE Climate Working Group Report*. https://drive.google.com/file/d/1PwAR8I9YYmPhbQ6CRekHkroJGMbjbX7l/view.

⁷ Columbia Law School Sabin Center for Climate Change Law. 2025. *Department of Energy report includes false claims about climate change*. Sabin Center for Climate Change Law.

https://climate.law.columbia.edu/content/department-energy-report-includes-false-claims-about-climate-change

⁸ Taft, M. 2025. *Scientists say new government climate report twists their work*. Wired. https://www.wired.com/story/scientists-say-new-government-climate-report-twists-their-work/

⁹ USGCRP, 2023: Fifth National Climate Assessment. Crimmins, A.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, B.C. Stewart, and T.K. Maycock, Eds. U.S. Global Change Research Program, Washington, DC, USA. https://doi.org/10.7930/NCA5.2023

¹⁰ IPCC, 2021: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S.L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M.I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T.K. Maycock, T. Waterfield, O. Yelekçi, R. Yu, and B. Zhou (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, In press, doi:10.1017/9781009157896.

¹¹ IPCC, 2022: Climate Change 2022: Impacts, Adaptation, and Vulnerability. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [H.-O. Pörtner, D.C. Roberts, M. Tignor, E.S. Poloczanska, K. Mintenbeck, A. Alegría, M. Craig, S. Langsdorf, S. Löschke, V. Möller, A. Okem, B. Rama (eds.)]. Cambridge University Press. Cambridge University Press, Cambridge, UK and New York, NY, USA, 3056 pp., doi:10.1017/9781009325844.

¹² IPCC, 2022: Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [P.R. Shukla, J. Skea, R. Slade,

could also provide high quality, unbiased scientific input. Yet this administration has chosen to politicize science and sideline that robust body of scientific information and scientific expertise—even going as far as to halt the Sixth National Climate Assessment and disband its author team—while propping up the work of fringe climate deniers.

These violations of scientific best practice and administrative procedures are not mere academic matters; they have grave real-world consequences for the health and well-being of people across the nation. Trying to bury the evidence on climate change and impede efforts to limit its worst consequences will directly put people, the economy, and ecosystems in harm's way. Communities in the U.S. are already reeling from worsening climate impacts—including heatwaves, storms, floods, droughts, wildfires, and sea level rise. Lying about that reality doesn't change it, but it does leave people without the protections they need and deserve, and that they rightfully look to their government to provide.

The motivations for these actions are also blatantly clear and have been publicly expressed¹³: the goal is plainly to downplay the seriousness of climate change to prop up fossil fuel interests and profits while foisting the consequent health and economic harms on the general public. This subversion of the government's duty to uphold the public interest is reprehensible.

The CWG report actively and deliberately undermines the best available science

Below we categorize some of the major ways in which the CWG report is flawed, with some examples—although this is a far from exhaustive list. These disinformation tactics are a well-worn ploy of the fossil fuel industry^{14,15}—and indeed some of the CWG authors have been funded by or have worked for fossil fuel entities in the past. ¹⁶ It is alarming to see them now echoed by our government.

1. The CWG report perpetuates outright falsehoods. For example:

a. The report incorrectly claims the stratosphere has warmed post-2000; mid and upper-level stratospheric cooling has continued post-2000 (Santer et al. 2023; Fig. 1 a-c).¹⁷ Cooling in the lower stratosphere only stabilized briefly post-2000 because of the recovery of stratospheric ozone post-Montreal Protocol (Santer et al. 2023 Fig.

A. Al Khourdajie, R. van Diemen, D. McCollum, M. Pathak, S. Some, P. Vyas, R. Fradera, M. Belkacemi, A. Hasija, G. Lisboa, S. Luz, J. Malley, (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA. doi: 10.1017/9781009157926

¹³ https://www.energy.gov/articles/secretary-energy-chris-wright-delivers-keynote-remarks-ceraweek-2025

¹⁴Oreskes, N., & Conway, E. M. (2010). *Merchants of Doubt: How a Handful of Scientists Obscured the Truth on Issues from Tobacco Smoke to Global Warming*. Bloomsbury Press.

¹⁵ Brulle, R. J. (2014). Institutionalizing delay: foundation funding and the creation of U.S. climate change counter-movement organizations. *Climatic Change*, *122*(4), 681–694.

¹⁶ E&E News. (2025, August 11). *How Chris Wright recruited a team to upend climate science*. E&E News. https://www.eenews.net/articles/how-chris-wright-recruited-a-team-to-upend-climate-science-2 [Feature article detailing CWG author selection and prior fossil-fuel aligned positions]

¹⁷ B.D. Santer, S. Po-Chedley, L. Zhao, C. Zou, Q. Fu, S. Solomon, D.W.J. Thompson, C. Mears, and K.E. Taylor. 2023. Exceptional stratospheric contribution to human fingerprints on atmospheric temperature, *Proc. Natl. Acad. Sci. U.S.A.* 120 (20) e2300758120, https://doi.org/10.1073/pnas.2300758120 (2023).

- 1d). Cooling of the stratosphere is the opposite of the heating in the troposphere, confirming the classic fingerprint of human-caused climate change that the report incorrectly suggests is not founded.
- b. The report incorrectly states Arctic sea ice has declined by 5% since 1980, when in fact it has decreased by ~40%. The authors incorrectly used Southern Hemisphere (Antarctic) Extent Anomalies from the National Snow and Ice Data Center to support their finding.¹⁸
- c. The report incorrectly states that area burned by wildfires in the U.S. has not increased since 2007, based on data from the National Interagency Fire Center (NIFC). The 10-year average burn rate was ~5.86 million acres in 2007. In 2024, it was ~7 million acres. In 2024, it was ~7 million acres.
- d. The report's discussion on carbon dioxide promoting plant growth and 'global greening' (Chapter 2.1) is fallacious; the report ignores how rising carbon dioxide levels and consequent warming of the planet is harming plants, as stated in the IPCC's Sixth Assessment Report (e.g. AR6 WG2 Technical Summary TS.B.1.5 and TS.C.1.4)²¹, and how it affects food security due to changing precipitation patterns and extreme weather events heightened by climate change.
- e. The report states that attribution of extreme weather events to anthropogenic carbon dioxide emissions is challenged by natural climate variability, data limitations, and model deficiencies; however, modern climate attribution science methods explicitly account for these factors through rigorous statistical techniques, multi-model ensembles, and control climate model simulations.^{22, 23, 24}
- 2. The CWG report cherry-picks select text, data, and studies that paint an incomplete picture. For example:
 - a. The report (p. 71) uses a flawed dataset to show U.S. wildfire trends from 1926-2023 from the NIFC. Despite stating how NIFC removed pre-1960 data because it is

¹⁸ See page 90 of the DOE report, where the authors incorrectly use this graph: https://nsidc.org/data/seaice_index/images/s_plot_hires.png, instead of the accurate one here: https://nsidc.org/data/seaice_index/images/n_plot_hires.png

¹⁹ National Interagency Fire Center 2007 Report: https://www.nifc.gov/sites/default/files/NICC/2-Predictive%20Services/Intelligence/Annual%20Reports/2007/annual_report_2007_508.pdf.

²⁰ National Interagency Fire Center 2024 Report: https://www.nifc.gov/sites/default/files/NICC/2-Predictive%20Services/Intelligence/Annual%20Reports/2024/annual_report_2024.pdf

²¹ Pörtner, H.-O., D.C. Roberts, H. Adams, I. Adelekan, C. Adler, R. Adrian, P. et al., *Climate Change 2022: Impacts, Adaptation and Vulnerability*. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [H.-O. Pörtner, D.C. Roberts, M. Tignor, E.S. Poloczanska, K. Mintenbeck, A. Alegría, M. Craig, S. Langsdorf, S. Löschke, V. Möller, A. Okem, B. Rama (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA, pp. 37–118, doi:10.1017/9781009325844.002
²² Daniel L. Swain, Deepti Singh, Danielle Touma, Noah S. Diffenbaugh. 2020. Attributing Extreme Events to Climate Change: A New Frontier in a Warming World. One Earth, Volume 2, Issue 6, 2020, Pages 522-527, ISSN 2590-3322, https://doi.org/10.1016/j.oneear.2020.05.011

²³ National Academies of Sciences, Engineering, and Medicine. (2016). *Attribution of Extreme Weather Events in the Context of Climate Change*. Washington, DC: The National Academies Press

²⁴ IPCC, 2021: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate. Chapter 11: [Sonia I. Seneviratne, Xuebin Zhang et al.] Weather and Climate Extreme Events in a Changing Climate. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 2391 pp. doi:10.1017/9781009157896.

- unreliable, the authors still include the pre-1960 data in their 6.8.3 Figure, which makes it look like wildfire rates were substantially higher decades ago than today. The report also omits the fact that the Western United States has had an accelerated rise in wildfires that is linked to climate change. ^{25, 26}
- b. The report uses selective text from the 4th National Climate Assessment on the Dust Bowl as evidence of natural variability around heat waves, omitting the fact, as stated in the 4th National Climate Assessment Climate Science Special Report (p. 190), that the Dust Bowl heatwave was exacerbated by poor land management.²⁷
- c. On changes in US sea levels (Chapter 7.2), the report (pp. 77-79) selectively chooses five tidal gauges and vertical land motion measurements to suggest rising sea-levels in the US are only due to land-sinking, ignoring satellite altimetry observations which clearly show the acceleration of sea-level rise due to thermal expansion of oceans and the melting of land-ice (e.g., land ice-sheets, glaciers), which are linked to climate change (IPCC AR6 WG1 Ch.9).²⁸ The US Fifth National Climate Assessment, which the report omits in this Chapter, includes these findings (e.g., Ch 2, pp. 15; 27; 35).²⁹
- d. The report selectively pulled a single supplemental figure (Fig. 3.2.1) from Hausfather et al.³⁰ to suggest past climate models have overestimated observations, virtually discarding the paper and its conclusion that past climate models have been accurate at predicting warming.
- e. The report selectively chooses a subset of fringe and outdated studies (e.g., on total solar irradiance reconstruction) to conclude uncertainty on the attribution of climate

²⁵ J.T. Abatzoglou and A.P. Williams. 2016. Impact of anthropogenic climate change on wildfire across western US forests, *Proc. Natl. Acad. Sci. U.S.A.* 113 (42) 11770-

^{11775,} https://doi.org/10.1073/pnas.1607171113 (2016).

²⁶ https://science.feedback.org/review/misleading-u-s-department-energy-climate-report-chooses-bias-over-science-climate-scientists-say/

²⁷ USGCRP, 2017: Climate Science Special Report: Fourth National Climate Assessment, Volume I [Wuebbles, D.J., D.W. Fahey, K.A. Hibbard, D.J. Dokken, B.C. Stewart, and T.K. Maycock (eds.)]. U.S. Global Change Research Program, Washington, DC, USA, 470 pp., doi: 10.7930/J0J964J6.

²⁸ Fox-Kemper, B., H.T. Hewitt, C. Xiao, G. Aðalgeirsdóttir, S.S. Drijfhout, T.L. Edwards, N.R. Golledge, M. Hemer, R.E. Kopp, G. Krinner, A. Mix, D. Notz, S. Nowicki, I.S. Nurhati, L. Ruiz, J.-B. Sallée, A.B.A. Slangen, and Y. Yu, 2021: Ocean, Cryosphere and Sea Level Change. In *Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change* [Masson-Delmotte, V., P. Zhai, A. Pirani, S.L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M.I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T.K. Maycock, T. Waterfield, O. Yelekçi, R. Yu, and B. Zhou (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, pp. 1211–1362, doi: 10.1017/9781009157896.011.

²⁹ Marvel, K., W. Su, R. Delgado, S. Aarons, A. Chatterjee, M.E. Garcia, Z. Hausfather, K. Hayhoe, D.A. Hence, E.B. Jewett, A. Robel, D. Singh, A. Tripati, and R.S. Vose, 2023: Ch. 2. Climate trends. In: Fifth National Climate Assessment. Crimmins, A.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, B.C. Stewart, and T.K. Maycock, Eds. U.S. Global Change Research Program, Washington, DC, USA. https://doi.org/10.7930/NCA5.2023.CH2

³⁰ Hausfather, Z., Drake, H. F., Abbott, T.,& Schmidt, G. A. (2020). Evaluating the performance of past climate model projections. Geophysical Research Letters, 47, e2019GL085378. https://doi.org/10.1029/2019GL085378

change to carbon dioxide emissions (Chapter 8), despite overwhelming scientific consensus that changes to solar activity and other natural variabilities (e.g., IPCC AR6 WG1 Chapter 7³¹) do not explain the rapid warming of the planet, and that it is instead due to carbon dioxide and other heat-trapping emissions.

- 3. The CWG report employs deceptive framing to downplay climate change harms. For example:
 - a. The report focuses on absolute numbers of heat vs. cold mortalities to downplay climate change harms, despite risks from heat-related mortalities rapidly rising due to climate change,³² and the fact that adaptation measures, like air-conditioning, have clear limitations.³³
 - b. The report downplays the effects of ocean acidification (Chapter 2.2) on the environment through selective framing. For example, the report states only that ocean acidification has a negligible direct impact on fish behavior, disregarding well-documented harms to other marine species and biological processes (e.g., IPCC AR6 WG2 Ch.3).³⁴ It also invokes pre-historic ocean conditions to emphasize past marine resilience, ignoring how historical pH changes occurred over millennia, whereas today's anthropogenic pH decline is far more rapid and unprecedented, negatively impacting marine ecosystems.

The CWG report was drafted via an improper process

The DOE and the EPA have been actively seeking to create a basis for undermining the science-based Endangerment Finding; the DOE's secret commissioning of the CWG report is part of that endeavor and is in violation of FACA requirements. The CWG satisfies the FACA definition of being

³¹ Forster, P., T. Storelvmo, K. Armour, W. Collins, J.-L. Dufresne, D. Frame, D.J. Lunt, T. Mauritsen, M.D. Palmer, M. Watanabe, M. Wild, and H. Zhang, 2021: The Earth's Energy Budget, Climate Feedbacks, and Climate Sensitivity. In *Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change* [Masson-Delmotte, V., P. Zhai, A. Pirani, S.L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M.I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T.K. Maycock, T. Waterfield, O. Yelekçi, R. Yu, and B. Zhou (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, pp. 923–1054, doi: 10.1017/9781009157896.009.

³² Lüthi S, Fairless C, Fischer EM, Scovronick N, Ben Armstrong, Coelho MSZS, Guo YL, Guo Y, Honda Y, Huber V, Kyselý J, Lavigne E, Royé D, Ryti N, Silva S, Urban A, Gasparrini A, Bresch DN, Vicedo-Cabrera AM. Rapid increase in the risk of heat-related mortality. Nat Commun. 2023 Aug 24;14(1):4894. doi: 10.1038/s41467-023-40599-x. Erratum in: Nat Commun. 2024 Sep 16;15(1):8110. doi: 10.1038/s41467-023-44107-z. PMID: 37620329; PMCID: PMC10449849.

³³ Obringer, R., Nateghi, R., Maia-Silva, D., Mukherjee, S., CR, V., McRoberts, D. B.,

[&]amp; Kumar, R. (2022). Implications of increasing household air conditioning use across the United States under a warming climate. *Earth's Future*, 10, e2021EF002434. https://doi.org/10.1029/2021EF002434

³⁴ Cooley, S., D. Schoeman, L. Bopp, P. Boyd, S. Donner, D.Y. Ghebrehiwet, S.-I. Ito, W. Kiessling, P. Martinetto, E. Ojea, M.-F. Racault, B. Rost, and M. Skern-Mauritzen, 2022: Oceans and Coastal Ecosystems and Their Services. In: *Climate Change 2022: Impacts, Adaptation and Vulnerability*. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [H.-O. Pörtner, D.C. Roberts, M. Tignor, E.S. Poloczanska, K. Mintenbeck, A. Alegría, M. Craig, S. Langsdorf, S. Löschke, V. Möller, A. Okem, B. Rama (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA, pp. 379–550, doi:10.1017/9781009325844.005.

an "advisory committee," given that it was explicitly convened to provide recommendations and advice to the DOE and EPA, and the EPA has already used it as a basis for proposing to overturn the Endangerment Finding.

We briefly summarize here two primary areas of concern related to violations of FACA's procedural and substantive requirements, which are further elaborated in the August 12, 2025 legal filing from EDF and UCS.³⁵ These include:

- 1. **Secret selection of a biased group**: Secretary Wright quietly arranged for a hand-picked, non-representative group of individuals with a record of disputing mainstream climate science to draft the CWG report. The creation of this non-representative group—stacked with people who opposed the overwhelming consensus of the scientific community on climate science—does not meet FACA's requirements for balanced representation in such committees.
- 2. Lack of transparency of the group's work: The biased group of report drafters conducted their work in secrecy without any public meetings or public availability of information about their work. The very existence of the group was not revealed until months into its work. Under FACA, Congress mandated transparency in the establishment and operation of any federal advisory committee, including by requiring that the group's formation be promptly disclosed and that its meetings, emails, and other records be open to the public.

This report fundamentally fails to meet FACA requirements and thus should not be used to inform agency policies or decisions. The DOE and the EPA should publicly disclose all the relevant information about the drafting of the CWG report, and the workings of the group convened to draft it. Furthermore, if the DOE and EPA want to put together an advisory committee to assess the latest climate science, they should follow the law and all the applicable FACA requirements in doing so.

The CWG report must be retracted

In sum, this draft CWG report has been thoroughly debunked by the scientific community and was prepared through a fundamentally flawed and potentially unlawful process. It should immediately be discarded and definitively precluded from being used for agency decision-making. Given the extremely consequential nature of this report, we also object to the unusually short notice-and-comment period provided by the DOE.

There are ample legitimate scientific bodies and scientists that the DOE and EPA can turn to if they are genuinely interested in an updated assessment of the latest climate science to help guide policy decisions. The National Academies has convened a process—necessarily fast-tracked to fit within the arbitrarily short comment deadlines set by the agencies— as one avenue for this information.³⁶ We urge the DOE and the EPA to stop colluding on these dangerous and destructive

³⁵ https://library.edf.org/AssetLink/0kdlw6oq5v8hsvj152eqx01b0qn74uuq.pdf

³⁶ National Academies of Sciences, Engineering, and Medicine. 2025. "National Academies Launch Fast-Track Review of Latest Evidence for Whether Greenhouse Gas Emissions Endanger Public Health and Welfare." Press release. Online at https://www.nationalacademies.org/news/2025/08/national-academies-

efforts to overturn the Endangerment Finding and repeal pollution standards for power plants, vehicles, and other sources of heat-trapping emissions. We urge the Trump administration to stop its wide-ranging assault on science and to restore science-based policymaking, with strong scientific integrity safeguards, across agencies.³⁷

The world is teetering on the brink of crossing the 1.5°C mark on a long-term basis, a critical benchmark for science-informed global climate goals. Yet global heat-trapping emissions are far off-track from where they need to be to limit the worst consequences of climate change. The United States cannot solve this problem alone—but as a leading contributor to global emissions, our nation's actions have profound consequences for the trajectory of the climate crisis. Instead of doing everything it can to worsen the problem, the administration must help ensure our nation is part of the solution, for the sake of people today and for generations to come.

Comments submitted on behalf of the Union of Concerned Scientists by:

Rachel Cleetus

Juli Malann

1 plans

Rachel Cleetus, Ph.D. Senior Policy Director, Climate and Energy Program

Carlos Martinez, Ph.D. Senior Climate Scientist, Climate and Energy Program

Julie McNamara, Associate Policy Director, Climate and Energy Program

L. Delta Merner, Ph.D., Lead Scientist, Climate and Energy Program

July 100

Marc J. Alessi, Ph.D., Hitz Climate Fellow, Climate and Energy Program

<u>launch-fast-track-review-of-latest-evidence-for-whether-greenhouse-gas-emissions-endanger-public-health-and-welfare.</u>

³⁷ The Trump Administration's recent attempts to undermine agency scientific integrity policies, including via a recent Executive Order and guidance from the Office of Science and Technology Policy, raises significant red flags. See https://blog.ucs.org/jules-barbati-dajches/with-new-guidance-trump-administration-deceptively-targets-scientific-integrity/