Alan R.P. Journet Ph.D.
Cofacilitator
Southern Oregon Climate Action Now
August 18th 2025

Comments on: Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards; Docket ID EPA-HQ-OAR-2025-0194

Colleagues:

I write on behalf of myself and as cofacilitator of Southern Oregon Climate Action Now, an organization of some 2,000 Southern Oregonians who are concerned about the climate crisis and seek local, state and federal action to address it. I write in connection with the EPA's effort to abandon consensus science and negate a scientifically credible finding in favor of a finding ostensibly based on the flawed and never peer-reviewed document created by Christy et al (2025) but, in reality, more likely based on preconceived delusion and adherence to an absurd hoax about global climate trends that is rejected by the vast majority of climate scientists. The reality is that some 97% of publishing climate scientists agree with the consensus that human-induced emissions of greenhouse gases are driving the warming we are experiencing (NASA 2024). There is little surprise among rational scientists that the Trump administration and its EPA would call up members of that minuscule percent of contrarians to develop a report on the status of climate science that conforms to their delusional world view rather than understood scientifically-demonstrated reality. To deny the consensus science is to live in a world driven by hoax and nonsense.

On an individual level, everyone is entitled to their own opinion. If an individual decides that the Earth is flat, they probably can live their lives without doing themselves or anyone else too much harm. Similarly, if an individual lives their lives concluding that there is no global warming happening that results from human-induced emissions of greenhouse gases, they can probably live their lives without doing themselves too much harm. However, those making public policy can do huge amounts of harm if they base policy on their ridiculous and delusional rejection of data, evidence, science and demonstrated reality.

Politicians and political commentators generally have no understanding of the basic methodology of science. Indeed, that is also the case for some scientists who operate more akin to the politicians and commentators than to credible scientists. The basic principle of science is to erect hypotheses and then seek data and evidence that would falsify those hypotheses. Only when tests and evidence fail to falsify a hypothesis does confidence in it grow. This is how climate science operates. The route for hypotheses to gain support is the peer-reviewed

publication where methods and data are subjected to scrutiny by one's peers before they appear in print. This methodology is not foolproof, but it's considerably better than an approach such as that adopted by the Trump Department of Energy where the writing of a well-known cabal of climate science deniers is published and lauded as sufficiently credible without any peer review. It's shameful enough to release this report and accord it credibility, but it's worse that policy should be based on it. This defies reason and risks the futures of our children, grandchildren and generations down the line plus all living species on the planet. In contrast to the scientific method, the methodology of politicians and political commentators is largely based on identifying an opinion and seeking evidence to support it. This approach is very different from science and is almost guaranteed to produce a delusional world view as only evidence supporting the opinion is considered while any evidence denying it is ignored or disputed. It seems evident that the so-called Climate Working Group (notice their suggested citation does not even include any of their names) has employed the political approach rather than the scientific approach. Instead of a credible report, we find a document replete with false and misleading statements.

Figure 1. Pages in the Climate Working Group document containing one or more false (red) or misleading (orange) statements. (Tandon et al. 2025)

Tandon et al. (2025) conducted a fact check on the product of the Climate Working Group and reported more than 100 false or misleading claims. As depicted in Figure 1, over a quarter of the pages contain one or more such statements. This destroys the credibility of the entire document.

Meanwhile, in the frontline prestigious journal *Science*, Voosen (2025) offers comments from some experts pushing back against the DOE document. It amounts to a "law brief from attorneys defending their client, carbon dioxide," said Andrew Dessler, a climate scientist at Texas A&M University, on Bluesky. "Their goal is not to weigh the evidence fairly but to build the strongest possible case for [carbon dioxide's] innocence. This is a fundamental departure from the norms of science." Naomi Oreskes, a historian of science at Harvard University argued: "This shows how far we have sunk" and "Climate denial is now the official policy of the U.S. government."

As is so often the case in the writing of climate science deniers, the authors misrepresent the published work of authors. In one example, a quoted author, Zeke Hausfather pushed back by pointing out the misrepresentations of his published writings (Hausfather 2025). In asserting that global trends to 2100 will be much below the IPCC worst case scenario, Christy et al (2025)

quote Hausfather's publications. However, they assert that the trend will resemble Hausfather's lower projections without pointing out that these projections assume considerable effort is undertaken to stem the flow of greenhouse gas emissions. More extensive discussion of how EPA and DOE misused Hausfather's data can be found in Hausfather (2025). This technique is used often by those pushing back against laws and policies they don't like. Those arguing that we no longer need clean air and clean water rules because our air and water was now clean totally ignored the reality that the reason the reason air and water are clean is precisely those laws (Patton 2024). By the same token, in gutting the Voting Rights Act, the Supreme Court argued that voting was now fair, so we no longer need the provisions of the act, and they famously undermined it. In so doing they failed to acknowledge that voting was then generally fair precisely because of provisions of that Voting Rights Act (Lockings 2025). As Justice Ginsburg wrote in dissent "it was the equivalent of "throwing away your umbrella in a rainstorm [because you are dry]." (Locking 2025). As Domonoske (2024) reported, "the agency says, even if the EPA *could* regulate it [carbon dioxide], there's not a good reason to do so**,** in part based on a report from five scientists who reject the scientific consensus on climate change.

Nearly a decade ago, Schipani (2017) responding to the claim from U.S. Congressman Lamar Smith debunked the claim, reiterated in the Christy et al. (2025) report, that increasing atmospheric concentration of carbon dioxide is beneficial for agriculture. It is disturbing that the proponents of rejecting climate science should be so ignorant regarding the well-established understanding of how atmospheric carbon dioxide affects plant growth and food quality.

That the proposed action is irresponsible and poses a serious threat to the global economy, to humanity and life of the planet has been reported numerous times by those who understand climate science (e.g., Crimmins et al. 2023; IPCC 2023) Indeed, Crimmins et al (2025) state the case succinctly: "Climate changes are making it harder to maintain safe home and healthy families; reliable public services; a sustainable economy; thriving ecosystems, cultures, and traditions; and strong communities. Many of the extreme events and harmful impacts that people are already experiencing will worsen as warming increases and new risks emerge." Meanwhile, the latest IPCC (IPCC 2023) offers the following initial statemen in its 'Summary for Policymakers:' "Human activities, principally through emissions of greenhouse gases, have unequivocally caused global warming, with global surface temperature reaching 1.1°C above 1850–1900 in 2011–2020. Global greenhouse gas emissions have continued to increase, with unequal historical and ongoing contributions arising from unsustainable energy use, land use and land-use change, lifestyles and patterns of consumption and production across regions, between and within countries, and among individuals (high confidence)." Individuals across the planet may disagree with these assessments, just as they reject medical advice, at their own peril. However, when policymakers reject what the informed experts conclude, they place life on our planet at risk. This is neither reasonable nor acceptable.

I became a climate activist some three decades ago when I was teaching ecology at Southeast Missouri State University. I recall teaching a segment of that course on community ecology which deals with the structure and function of natural ecosystems. This involved discussion of a chart developed in the 1970s by community ecologist Robert Whittaker (Figure 2) that depicts the distribution of natural ecosystems globally in relation to the variables of mean annual temperature and mean annual precipitation. As can be seen from this chart (modified by myself to include more detail) relatively small shifts in temperature or precipitation can alter the climate sufficient to preclude natural ecosystems from continuing to exist where they historically and currently thrive and survive.

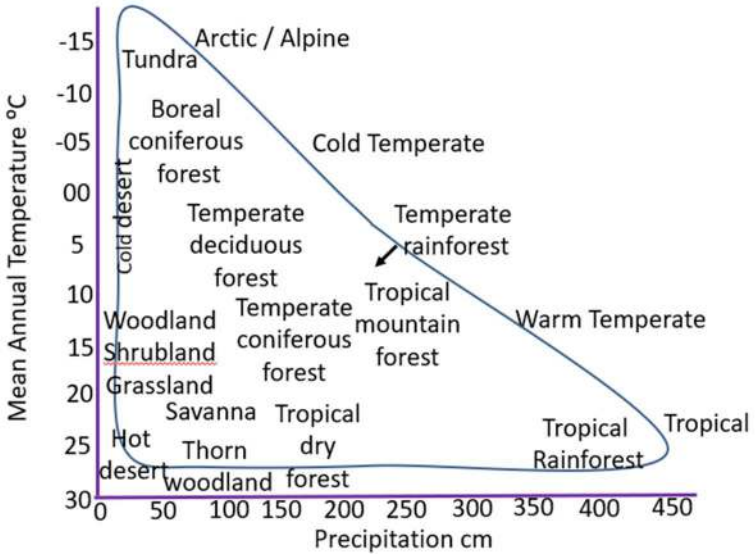

Figure 2. The global distribution of natural ecosystems in relation to mean annual average temperature and precipitation. Whittaker 1975, modified by Journet

I was aware at that time of contemporary climate science projections and decided, given the above ecological understanding, to explore it to determine its credibility. After several months of such exploration, I concluded that climate science was, indeed, credible. Since then, our collective understanding of trends and projections has only increased and confirmed the earlier consensus. Thus, if we consider current data and projections we find that the future is becoming bleaker by the day as we collectively fail to address the underlying cause of the global

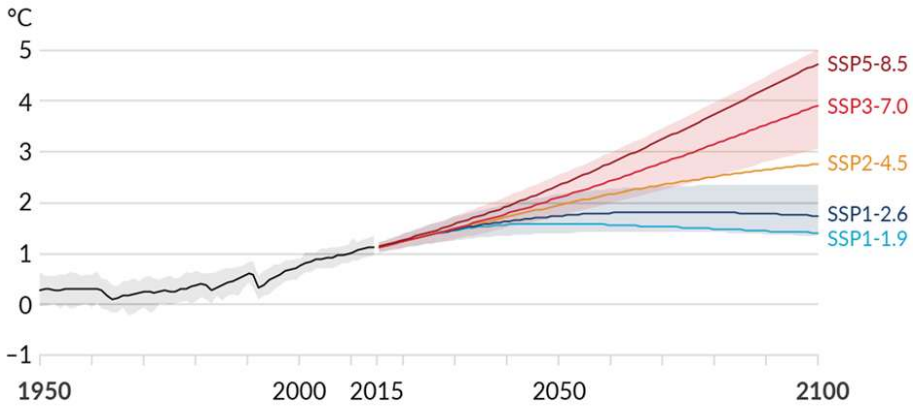

Figure 3. Global temperature Projections according to the Shared Socioeconomic Pathways to 2100 (BMO 2023)

warming and climate change we are experiencing and expecting - absent a meaningful response to avert the current trajectory.

Current projections for future global temperatures are varied according to the assumptions built into the General Circulation Models (GCMs) that generate them. The current round of projections is based on scenarios labeled Shared Socioeconomic Pathways (SSP's; Hausfather 2018) which identify a series of collective economic behaviors and energy use arrays. These range from SSP 1 involving a general worldwide conversion to a green sustainable economy to SSP 5 which assumes continued development of a fossil fuel economy. The global temperature projections that these SSP's depict are presented in Figure 3. It can readily be seen that SSP5, which has variously been dubbed the 'worst case scenario' and the 'business as usual scenario' is likely to result in a warming of some 5°C (9°F) over the 1850-1900 average while SSP 1 would lead to a peak rise of about 1.5°C followed by gradual decrease. Meanwhile, other scenarios suggest intermediate futures. Reflecting on the temperature range of natural ecosystems depicted in Figure 1 it is evident that such a climate shift will likely compromise the natural ecosystems of the U.S. and the world. Since our agriculture, forestry, and fisheries are profoundly influenced by these same variables, they, also, will be compromised.

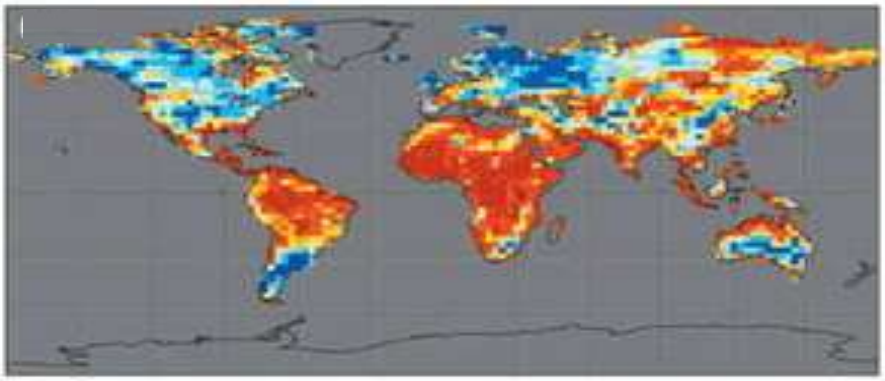

Figure 4a. The probability of future climate conditions supporting ecosystems within 500 km of existing location under the 850 ppm scenario. From Williams and Jackson 2007

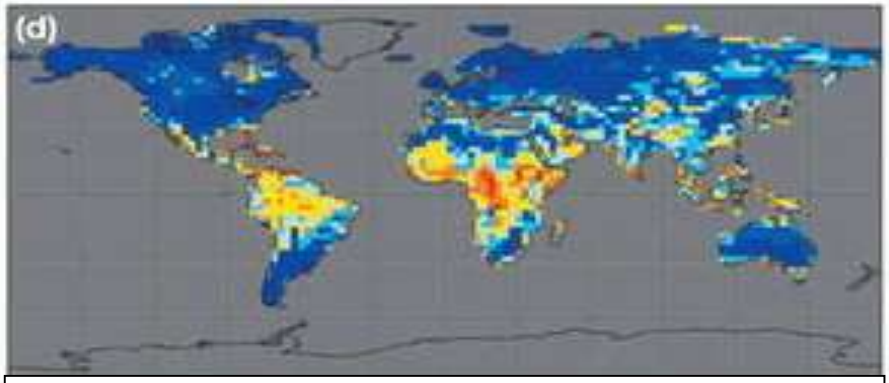

Figure 4b. The probability of future climate conditions supporting ecosystems within 500 km of existing location under the 550 ppm scenario. From Williams and Jackson 2007

Williams and Jackson (2007) published projections of how well current natural ecosystems might survive the anticipated climate change (Figure 4 a, b). They asked two questions under possible future climate conditions (i) will conditions occur anywhere on the planet allowing ongoing

survival of current natural ecosystems, and (ii) will conditions exist within 500 km (approximately 310 miles) of their current location. While the first question has theoretical interest, the second is of more practical interest since natural ecosystems have a very limited ability to exhibit range shift. This is partly because the intrinsic capacity of individual species to disperse is limited (imagine a pine tree and where the pine cones fall and you'll realize that's largely under the canopy of the tree). Limitations on range shift are also imposed by human activity (agriculture and urban and travel infrastructure, for example) which prevent species from growing far outside their current locations. Thus, 500 km seems a reasonable limit to explore given the rate of climate change and the capacity of ecosystems to shift their geographical range. The authors looked at the global distribution of future climate under two future scenarios: 850 parts per million carbon dioxide inducing a temperature shift of 5°C (9°F) and 550 ppm carbon dioxide inducing a 3.5°C (6.3°F) temperature shift. In the following maps, red implies there is zero chance that conditions will be appropriate for current natural ecosystems under the future scenario within 500 km of current location while blue implies there is a 100% chance. Intermediate colors imply intermediate probabilities. Figure 3a indicates that throughout Africa and tropical South America, under the 850 ppm (5°C; 9°F) future (there is little to no chance that natural ecosystems currently occupying the region will survive. Throughout the rest of the planet, current natural ecosystems have variable probabilities for survival anywhere within the 500 km range. Figure 3b, meanwhile, indicates that under the 550 ppm future scenario (3.5°C; 6.3°F), the prognosis for natural ecosystems surviving within the 500 km distance of their current location is much better though many will still be severely challenged with some unable to survive. It's important to appreciate, also, that our agriculture, forestry and fisheries are dependent on the same variables, thus these will also be as compromised under the scenarios depicted as severely as the natural ecosystems. Clearly, the human populations and natural biodiversity of the continent of Africa will be desperately challenged if climate change is not curtailed.

I understand that some in the current Administration deny data, evidence, and reality. They deny for example that tariffs constitute a tax on the American consumer (Gore 2025), that Bureau of Labor Statistics data on jobs and inflation indicate an economic downturn (Aitken 2025) or that mRNA vaccines exhibit considerable potential for curtailing many diseases (Scott 2025). To reject the consensus of climate scientists that global warming and its climate change consequences pose a serious threat to the continuation of life on the planet as we know it may be merely an extension of this intemperate thinking. Many of us rely on Physicians and Specialists when dealing with health issues. Doing so is predicated on our assumption that we trust the medical science that has led to these experts deciding what treatment to advise. Once advised, we are then able to accept or reject what we are told, recognizing that we, individually, for better or worse, will experience the consequences of our decision. In the case of climate science, our responsibilities are greater than just ourselves; we must recognize that we are assuming responsibility for determining what happens to humanity and all life on Earth. It seems to me that uninformed (i.e., scientifically ignorant) politicians should acknowledge their

lack of expertise and not simply decide that their pre-conceived opinions based on their political philosophy and partisanship should usurp the consensus of those with expertise in the arena.

As a result of this analysis, those of us with an understanding of the science and the consequences of unrestricted greenhouse gas emissions implore our government to reverse course. We urge you to accept climate science, and spare our children, our grandchildren, and all life on Earth, the consequences of unabated global warming and climate change. This is what assuredly will be imposed on the planet by eliminating both the EPA endangerment finding and the regulations that follow from it.

Respectfully submitted

Alan Journet Ph.D.

7113 Griffin Lane

Jacksonville
OR 97530-4182

alan@socan.eco
541-500-2331
541-301-4107

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