

September 2, 2025

The Honorable Chris Wright
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20024

RE: [Docket No. DOE-HQ-2025-0207](#)

Dear Secretary Wright:

We write to you to express our sincere concern with the weak scientific integrity and faulty conclusions presented in the U.S. Department of Energy (DOE) 2025 Climate Working Group's draft report, "A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate." We share the vision expressed in your foreword "to encourage a more thoughtful and science-based conversation about climate change and energy" and agree that "climate change is real and deserves attention" — but we must express alarm at the conclusions that downplay the impacts of greenhouse gas (GHG) emissions on the climate and human health and welfare. As states leading the nation in advancing high-impact climate solutions, we know that addressing climate change is an effective means of growing our nation's economy and protecting our energy security.¹ Tackling climate change is vital to securing the health, prosperity, and safety of all Americans, and the federal government has a legal obligation to protect human health and the environment. We urge DOE to rescind this report or issue a revised report that reflects the overwhelming scientific consensus on climate science.

The science is clear: Scientists across the world agree that GHGs caused by human activity are accelerating the pace of global warming. Since 1988, the Intergovernmental Panel on Climate Change (IPCC) has analyzed scientific literature and published regular assessments that provide the robust, transparent, reliable, and globally agreed-upon scientific basis for climate action. Each of these reports are prepared by hundreds of international experts, informed by thousands of peer-reviewed scientific publications, and approved by IPCC member countries.^{2,3} The confidence in findings detailed throughout these reports has only grown stronger over time, with the latest report, based on more than 14,000 scientific publications, concluding that GHG emissions from human activity — namely the burning of fossil fuels — have "unequivocally" caused changes to the climate that are "rapid, intensifying, and unprecedented" and have caused temperature increases well beyond natural fluctuations.⁴

The pace of climate change is accelerating, and human activity is the leading cause. As climate change worsens, the frequency and intensity of disasters and other extreme weather events — like heat waves, extreme rainfall, and more — increase, and the risk area of these disasters expands.⁵ 2024 was the tenth consecutive year in which 10 or more billion-dollar climate-related disaster events impacted the U.S.⁶ The U.S. also saw 27 climate-related disasters that totaled over \$1 billion in damages last year,⁷ marking the fourth-costliest disaster spending year in the nation's record.⁸ From May 2024 to May 2025, U.S. disaster spending nearly topped \$1 trillion, or 3% of GDP.⁹ Since 2017, U.S. insurance premiums have doubled, drastically increasing the financial costs for communities and individual consumers.¹⁰ The mounting costs of severe storms, hurricanes, wildfires, droughts, extreme heat, and flooding events make it imperative for our states to prepare for, insure against, and adapt to worsening climate change impacts — especially in vulnerable communities, which disproportionately shoulder the burden of such harms.

With each incremental increase in temperature, the risk of these extremes grows.¹¹ Recent wildfires in California,¹² catastrophic flooding in Texas,¹³ and devastating storms in North Carolina^{14,15} claimed the lives of hundreds of Americans and caused widespread damage to public infrastructure. Alarming, this Administration has taken action to halt the reporting of disaster trends, leaving Americans less informed, prepared, and able to withstand climate-related natural disasters.¹⁶

There is robust literature available on the causes and impacts of climate change informed by the work of thousands of scientists across the globe. The best summaries of this work are captured through the IPCC Assessment Reports and a series of National Climate Assessments developed by the U.S. Global Change Research Program, spotlighting U.S. climate impacts. By contrast, this DOE report was conducted by five hand-picked climate skeptics whose views do not reflect the current state of the science of climate change and whose work was not subject to any broad peer review.¹⁷ It does not accurately reflect the overwhelming scientific consensus on the causes and impacts of GHG emissions on global warming and human health. This report was rushed to publication with cherry-picked research, selective metrics, and widespread scientific inaccuracies.¹⁸ The publication of this report dovetails with the Administration's recent decisions to pull funding for NOAA's billion-dollar disaster database, remove congressionally-mandated National Climate Assessments from government websites, and dismantle climate research across numerous agencies. Misrepresenting the science, diminishing federal tracking and reporting of key data, and ignoring or hiding scientific research from the public will not eliminate the real-world impacts of a changing climate. Instead, it jeopardizes the safety and well-being of communities across our nation and leaves us less prepared for worsening climate impacts, including disasters.

The DOE report falsely asserts that U.S. policy action will have “undetectably small direct impacts on the global climate.” While it is certainly true that climate change is global in nature, the United States is currently the second largest emitter of GHG pollution — behind only China — and the largest source of cumulative emissions over time. Every ton of abated emissions matters.¹⁹ A robust literature informed by the work of the National Academy of Science²⁰ has analyzed the incremental impacts of additional emissions and found that each ton of emissions has negative impacts on human health, ecosystems, and the economy. These damages can be monetized and expressed as a social cost of GHGs. With U.S. emissions surpassing 5 billion tons each year, related damages are estimated between \$500 billion and \$1 trillion dollars.²¹ To state that reductions in U.S. emissions have undetectably small impacts does not align with this scientific and economic context.

In their Sixth Assessment Report (2021), IPCC authors concluded that historical emissions have driven negative outcomes, spanning every sector of our economy and corner of our country and planet.²² While extreme weather events are among the greatest and most visible risks of climate change, there are myriad localized, near-term impacts that directly affect people's daily lives. These include higher food prices,^{23,24} higher energy prices,^{25,26} greater health risks,^{27,28} higher home insurance rates,^{29,30,31} impacts to recreational activities,^{32,33,34} and more:

- **Rising temperatures:** Each of the last four decades has been increasingly warmer than all preceding decades since 1850, and in the last 50 years, surface temperature has increased faster than any time in the last 2,000 years. 2024 was the hottest year ever recorded;³⁵ projections indicate that 2025-2029 could be even hotter.³⁶ Robust evidence shows that this level of warming is unprecedented and dangerous, as every incremental increase in temperature correlates with greater impacts that threaten the health of the climate, and in turn the lives and well-being of individuals and communities across the globe.³⁷
- **Rising sea levels and rapidly changing oceans.** Since 1901, average annual sea level rise has occurred at a rate faster than any century in the last three millennia. Oceans are among the world's key defenses against rising temperatures. To date, they have absorbed over 90% of excess heat from increased GHG emissions, but their capacity to do so is limited. Such heat absorption has caused numerous ocean-based climate indicators to reach unprecedented levels, threatening not just marine ecosystems but also our global climate.
- **Shifting ecosystems.** As temperatures rise, species shift their geography and timing of seasonal events. Many land and marine animal species are increasingly shifting poleward and to cooler altitudes. Climate zones³⁸ are shifting poleward and are accompanied by changes in growing seasons across the northern hemisphere. Longer seasons can increase the length and severity of pollen and allergy seasons.

- **Rising costs.** Americans are already seeing the impacts of climate change at their kitchen tables. In some states, droughts have driven year-on-year vegetable price increases of up to 80%;³⁹ this trend is likely to continue. In a June 2025 study, researchers found that under current conditions, global yields of staple crops will likely be reduced by approximately 8% by 2050. These losses would be further compounded with each additional degree of warming that occurs,^{40,41} impacting food availability, price, and the livelihoods of our farmers. As hazard-prone areas expand and disaster risk increases, American homeowners find themselves paying higher insurance premiums and out-of-pocket costs for climate-related damage. Others may struggle to purchase or keep their homes due to declining availability and rapidly rising prices of coverage necessary to meet home mortgage requirements.⁴² Electricity prices are rising,⁴³ partially due to the costs associated with strengthening resilience of the grid to address the effects of extreme weather events and wildfires.

In the face of climate risk, our states are taking bold climate action — and communities across America are seeing the benefits. States continue to act to both reduce GHG emissions and bolster climate resilience and adaptation by strengthening governance and planning efforts, investing strategically, implementing community-led resilience projects, and adapting insurance frameworks to help the country better withstand and recover from extreme events. Analyses show that as weather events increase in frequency and severity, the social and economic costs of climate change’s impacts far outweigh the costs of mitigation.^{44,45} For every dollar invested in resilience and preparedness, communities save \$13 in economic and damage costs after a disaster.⁴⁶ Our states are pushing forward on solutions to protect lives and property, deliver clean air and water, and ensure affordable, reliable energy for Americans. Each metric ton of abated emissions and dollar invested in climate resilience minimizes the compounding risk of future climate disasters. Climate action, however incremental, is critical in safeguarding lives, livelihoods, and money — both today and into the future.

Climate change is, indeed, a global problem — and the U.S. is a global leader. Tackling the challenge of climate change allows us to take full advantage of climate investments and set a bold example for countries around the world. It also positions the U.S. to be globally competitive across sectors, including industry, transportation, and energy.⁴⁷ America’s climate progress and economic strength are a testament to the work of our states. We must continue to accelerate climate action across sectors and in every part of the country, ensuring we lead the world in addressing climate change.

The adoption of federal climate policy and investment in future federal research efforts should be based on sound scientific consensus. Decisions based on the deeply flawed climate science presented in this report risks endangering Americans’ health and well-being, economic prosperity, and security. GHG emissions from human activities are the primary driver of climate change, and taking action to reduce these emissions protects the lives and livelihoods of Americans today and for generations to come.

Our states value and remain committed to science-based decision-making and climate action to safeguard communities across America. We welcome this opportunity to collectively share how climate change impacts our states, alongside additional comments submitted by individual states. We urge you to rescind or revise this report to include a diverse group of reputable climate scientists, not a select group of climate skeptics, and provide an accurate overview of climate science — one that reflects the federal government’s obligation to protect the American people from the harms of climate change and encourages continued climate action in the United States.

Signed,

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California Environmental Protection Agency

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