



Issues To Highlight in Your Individual Comments on August 2025 DOE Report:

[A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate](#)

Note that comments are due on September 2, 2025, and you can [submit your comments here](#).

Before you get started:

- Carefully review these [suggestions](#) on how to make effective comments on the regulatory process and these [additional tips](#) from regulations.gov.
- Review EPN's [Background and Messaging](#) on this report

Below are a number of issues that you can focus on. Note that this is not a complete outline of possible issues to consider. We recommend that you pick a handful of specific points that you are the most knowledgeable about and focus on those. We recommend you use your own words and do not cut and paste from existing form letters (or EPN's documents). You can use AI to help you generate material, but you will want to fact check and edit anything AI-generated.

1. Scientific information quality
 - a. Author selection
 - i. Lack of author balance (topics, perspectives)
 - ii. Lack of author expertise
 - iii. Small number of authors relative to breadth of issues
 - b. Peer review and review transparency
 - i. Lack of reviewer independence
 - ii. Lack of public comment prior to use in major regulatory action
 - iii. Failure to identify reviewers
 - iv. Unknown breadth of reviewer expertise
 - v. Failure to publish review comments and responses
 - c. Bias
 - i. Comments by Chris Wright or authors indicating efforts to reach particular conclusions
 - ii. Failure to cite studies that contradict conclusions
2. Scientific issues
 - a. Lack of meaningful scientific evaluation of the definition of an air pollutant
 - b. Lack of time to adequately review the report. There is no compelling scientific reason for limiting the comment period to 30 days.
 - c. Failure to cite major assessments except as the basis of critique (IPCC Assessment Reports, National Climate Assessments, National Academies reports)
 - d. Failure to cite major review studies or meta-analyses well-recognized on different topics

- e. Reliance on secondary metrics (e.g., rate of temperature change vs. temperature change)*
- f. Reliance on limited sample sizes to draw broad conclusions (e.g., sea level rise discussion)
- g. Reliance on simplistic analytical methods (e.g., linear regression for sea level rise when more sophisticated methods would yield opposite results)
- h. Misrepresenting cited studies (see Hausfather, <https://www.theclimatebrink.com/p/how-the-doe-and-epa-used-and-misused>)
- i. Presenting irrelevant information (e.g., Figure 2.2, discussion of the Permissible Exposure Level for CO₂)

*The report ignores the primary scientific measures and focuses on secondary metrics. As an example, the report focuses on climate models' relatively poorer performance in simulating surface temperatures in the tropics and skips any mention of the models' remarkably good performance in simulating global mean surface temperature (the primary metric of concern). Commenters should be alert to the use of odd metrics, periods of analysis (e.g., temperature trends over 45 years rather than more standard 20 or 50 years), or spatially limited analyses.