August 29, 2025

Public Comments Processing
Attn: Docket No. DOE-HQ-2025-0207
Policy and Regulations Branch
Department of Energy
1000 Independence Avenue SW,
Washington, DC 20585

Submitted via www.regulations.gov (Docket No. DOE-HQ-2025-0207)

Public Comment Re: Notice of Availability: A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate; Docket (DOE-HQ-2025-0207)

Dear Department of Energy,

We are writing to express scientific opposition to the Climate Working Group's (CWG) recent report titled "A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate" (CWG Report). This report is unsystematic and incomplete as it selects for studies and data that downplay climate change's severity, while ignoring the wider body of literature. At Polar Bears International, we rely heavily on sound climate science to inform our conservation objectives because sea ice loss from climate change is the greatest threat to polar bears. We are concerned by the lack of scientific integrity in the CWG's climate assessment.

Unlike assessments from the Intergovernmental Panel on Climate Change (IPCC) or past U.S. National Climate Assessments which have numerous contributors, this report has very few contributors with no external peer review—public or expert. The CWG is made up of five individuals who are known for their public skepticism about the severity of climate change and the reliability of climate models. It should be noted that this report relies disproportionately on those authors' papers. Proper assessments—both in the IPCC and in the science that informs it—are built from years of discussion among hundreds of authors from all around the world.

In terms of content, each chapter of the CWG Report follows a pattern of presenting a contrarian position, cherry picking evidence to support that position, and then claiming this position is under-represented in climate literature. A few examples of this pattern in the report include:

- Chapter 2 proposes 'global greening' as a net positive outcome from increased CO_2 concentrations and neglects to cover the impacts of heat stress, increased drought, and nutrient limitations which support the IPCC's net-negative assessment.[1]
- Chapter 4 proposes that IPCC assessments of climate severity are biased high, citing targeted studies which supported lower values. IPCC assessments relied on a range of evidence with multiple sources and assessed the influence of each.[2]
- Chapter 6 presents several cherry-picked extremes. First, it argues that the existence of the 1930s dust bowl proves that U.S. heatwaves aren't unprecedented, ignoring regional patterns and land use changes. Second, it argues that hurricanes are no more frequent, even though they are stronger with more rain and bigger storm surges.[1] Finally, the report states U.S. fire ignitions remain flat, omitting that burned area, severity and persistence have all exceeded records. They highlight the role of management, and while decades of fire suppression certainly play a part, so does more frequent fire weather.[3]
- Chapter 7 covers sea level rise, focusing on cherry-picked data from individual tide gauges and ignoring global data from satellite altimetry—which identify with 'high confidence' a global-scale acceleration in sea level rise.[4]

While the CWG Report does not claim to be comprehensive, it omits important climate change impacts on ecosystem functioning, biodiversity, wildlife, or human health—all with clear negative consequences for American socio-economic wellbeing.

In summary, we are concerned by the ways this report elevates minority viewpoints by isolating specific data and omitting the majority body of climate research, with the ultimate outcome of downplaying the severity of climate change. Adequately addressing the threat of climate change—to polar bears, our communities, and global ecosystems—requires principled science and governance. This report does not meet those standards.

Please reach out to our team at info@pbears.org if you have questions, and thank you for considering these comments.

Sincerely,

Dr. Flavio Lehner
Chief Climate Scientist
Polar Bears International

Emily Ringer
Director of Policy
Polar Bears International

[1] IPCC, 2023: Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, H. Lee and J. Romero (eds.)]. IPCC, Geneva, Switzerland, pp. 35-115, doi: 10.59327/IPCC/AR6-9789291691647.
[2] Sherwood, S., Webb, M., Annan, J., Armour, K., Forster, P., Hargreaves, J., Hegerl, G., Klein, S., Marvel, K., Rohling, E., Watanabe, M., Andrews, T., Braconnot, P., Bretherton, C., Foster, G., Hausfather, Z., von der Heydt, A., Knutti, R., Mauritsen, T., Norris, J., Proistosescu, C.., Rugenstein, M., Schmidt, G., Tokarska, K., Zelinka, M. (2020). An Assessment of Earth's Climate Sensitivity Using Multiple Lines of Evidence. https://doi.org/10.1029/2019RG000678
[3] Liu, Z., Eden, J. M., Dieppois, B., & Blackett, M. (2021). A Global View of Observed Changes in Fire Weather Extremes: Uncertainties and Attribution to Climate Change. https://doi.org/10.21203/rs.3.rs-1054722/v1
[4] Lindsey, R. (2023, August 22). Climate change: Global sea level. NOAA Climate.gov. http://climate.gov/news-features/understanding-climate/climate-change-global-sea-level