United States Senate

WASHINGTON, DC 20510

September 2, 2025

Re: Docket ID No. DOE-HQ-2025-0207

Dear Secretary Wright,

We write in opposition to the Department of Energy's misleading, pseudo-scientific report entitled "A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate" ("DOE Report" or "Report"). Contrary to the overwhelming scientific evidence published in peer-reviewed journals and synthesized periodically in robust reports by the United States Global Change Research Program and the Inter-governmental Panel on Climate Change (IPCC), the DOE Report pushes the incorrect view that human-caused climate change is not a threat. In a separate action, EPA relies on this slapdash Report to support its misguided proposal to withdraw the 2009 endangerment finding. The DOE Report makes a mockery of established science and the scientific process, and its many flaws mean that both it and EPA's proposed repeal of the endangerment finding must be withdrawn. Moreover, the secretive and tendentious process DOE used to select and manage the authors of the Report (the "Climate Working Group") appears to violate the Federal Advisory Committee Act (FACA).

Lacking credible science to support its desired outcome, the Trump Administration has turned to the same small clique of climate science deniers that the fossil fuel industry regularly trots out to deny the overwhelming scientific consensus that human-caused climate change is real and presents grave environmental and economic threats. But just because these climate change deniers exist does not mean they are credible: there is a greater than 99% consensus in the peer-reviewed scientific literature that human-caused climate change is real.[1] There is also a clear scientific and economic consensus that climate change will be damaging and expensive both in the U.S. and globally, causing greater numbers of weather disasters,[2] threatening energy infrastructure,[3] and disrupting food system security.[4] The Climate Working Group wishes this science away by arguing that climate costs have been eclipsed thus far by global Gross Domestic Product[5]—magical thinking that devalues the real and growing absolute costs borne on farmers[6]

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[1] Mark Lynas *et al.*, "Greater than 99% consensus on human caused climate change in the peer-reviewed scientific literature," 2021 Environ. Res. Lett. 16 114005 (October 19, 2021), https://iopscience.iop.org/article/10.1088/1748-9326/ac2966.

[2] U.S. Global Change Research Program, Fifth National Climate Assessment (2023), at 2-17, https://toolkit.climate.gov/sites/default/files/2025-07/NCA5_2023_FullReport.pdf.

[3] *Id.* at 5-4.

[4] *Id.* at 11-14.

[5] *See*, *e.g.*, U.S. Department of Energy, A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate, 111, 117, https://www.energy.gov/sites/default/files/2025-07/DOE_Critical_Review_of_Impacts_of_GHG_Emissions_on_the_US_Climate_July_2025.pdf.

[6] Weather disasters cost American farmers $21.94 billion in crop and rangeland losses in 2023, Daniel Munch, Major Disasters and Severe Weather Caused Over $21 Billion in 2023, Farm Bureau (Feb. 29, 2024), https://perma.cc/2GDK-9GYY, and another $20.3 billion in 2024. Daniel Munch, Hurricanes, Heat and Hardship: Counting 2024's Crop Losses (Feb. 18, 2025), https://perma.cc/GXW6-JYC2 (noting also that roughly half of each year's losses were not insured).

and families,[7] and ignores the obvious signs of strain on insurance markets[8] that threaten a cascading economic crisis.

In a random draw of 5 climate scientists, it would be exceedingly unlikely to have even one among the group that denies the reality of anthropogenic climate change or the risks it presents. Yet, in a stunning example of results-driven decisionmaking, DOE handpicked 5 well-known climate contrarians to author its report, many with deep ties to the fossil fuel industry. By cherry-picking these climate science skeptics, DOE likely violated federal requirements to ensure a "fair balance" on federal advisory committees.[9] The Climate Working Group meets the statutory definition of an "advisory committee" and so is subject to the Federal Advisory Committee Act (FACA).[10] Indeed, the Group was "established or utilized to obtain advice or recommendations for . . . or one or more agencies or officers of the Federal Government," and is not "composed wholly of full-time, or permanent part-time, officers or employees of the Federal Government."[11] Yet DOE failed to comply with FACA or its implementing regulations. Among other infirmities, DOE did not file a Federal Register notice announcing creation of the group,[12] submit to the General Services Administration its "plan to attain fairly balanced membership" in the Group,[13] or conduct required outreach to interested parties and stakeholders.[14] Because DOE failed to file a charter with required information about the Group,[15] the Group had no authority to meet in the first place, but DOE compounded the problem by failing to provide notice that would have allowed interested members of the public to attend the Group's meetings.[16] DOE also violated multiple of FACA's record requirements.[17]

Under metaphorical cover of darkness, then, these 5 science skeptics produced a report purportedly debunking all of mainstream climate science in under two months, without peer

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[7] Losses from natural disasters in the United States now routinely approach an estimated $100 Billion a year, compared to $4.6 Billion in 2000. Senate Budget Committee, Committee Staff Report, Next to Fall: The Climate-Driven Insurance Crisis is Getting Worse (December 2024), https://www.budget.senate.gov/imo/media/doc/next_to_fall_the_climate-driven_insurance_crisis_is_here__and_getting_worse.pdf.

[8] Rates of insurance non-renewals are rising in counties in the United States most exposed to extreme weather events. Senate Budget Committee, Next to Fall, supra n. 7. So is the number of policies cancelled for nonpayment. Christopher Flavelle and Mira Rojanasakul, *More Americans, Risking Ruin, Drop Their Home Insurance*, New York Times (Jan 16, 2025), https://www.nytimes.com/interactive/2025/01/16/climate/home-insurance-cancellations.html. As insurance coverage drops, so will mortgage eligibility, leading to a decline in property values. *Global Warming is Coming for your Home*, The Economist (Apr. 11, 2024), https://www.economist.com/leaders/2024/04/11/global-warming-is-coming-for-your-home.

[9] *See Union of Concerned Scientists v. Wheeler*, 954 F.3d 11, 20 (1st Cir. 2020)

[10] 5 U.S.C. chapter 10.

[11] 5 U.S.C. § 1001(2).

[12] 41 C.F.R. § 102-3.65(a).

[13] 41 C.F.R. § 102-3.60(b)(3).

[14] 41 C.F.R. § 102-3.60(b)(3)(ii).

[15] 5 U.S.C. § 1008(c)(2), *see id*. § 1008(c)(1)-(2); 41 C.F.R. § 102-3.70.

[16] 5 U.S.C. § 1009(a)(2)-1(3); 41 C.F.R. § 102-3.150(a).

[17] *See, e.g.*, 5 U.S.C. § 1009(b)-(c); 41 C.F.R. § 102-3.165(b)-(c).

review.[18] The Report recycles fossil fuel industry talking points[19] that have been rebutted many times over.[20] It is littered with cherry-picked data[21] and outright falsities.[22] Numerous scientists whose research is cited in the Report have pointed out that the Report misrepresents their work.[23] Unsurprisingly, then, the Report also violates White House Office of Management and Budget guidelines instructing that final scientific documents must undergo independent, external peer review conducted in an "open and rigorous manner."[24] It is also impossible to square with President Trump's May 23, 2025 Executive Order entitled "Restoring Gold Standard Science," which states that "[r]eproducibility, rigor, and unbiased peer review must be maintained."[25]

The inadequacy of the DOE Report stands in stark contrast to the rigorous process that, for decades, has gone into compiling *credible* climate science reports synthesizing thousands of peer-reviewed studies. For instance, the 2023 Synthesis Report of the United Nation's IPCC was the culmination of 8 years of work, during which 721 volunteer scientists[26] reviewed all available published research and a team of 30 primary authors synthesized that work.[27] The conclusion reached by all that work? "Human activities, principally through emissions of greenhouse gases, have unequivocally caused global warming," which has "led to widespread adverse impacts and related losses and damages to nature and people."[28]

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[18] According to the Report, the five authors began work in early April and finished by a May 28 deadline. John Christy, et al., *A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate* at x, Dep't of Energy Climate Working Group (Jul. 23, 2025), https://www.energy.gov/sites/default/files/2025-07/DOE_Critical_Review_of_Impacts_of_GHG_Emissions_on_the_US_Climate_July_2025.pdf.

[19] Dharna Noor and Oliver Milman, "Scientists slam Trump administration climate report as a 'farce' full of misinformation," The Guardian (August 1, 2025), https://www.theguardian.com/us-news/2025/aug/01/trump-epa-climate-change-report (quoting one "esteemed climate scientist" as stating that the Report contained what he would expect "if you took a chatbot and you trained it on the top 10 fossil fuel industry-funded climate denier websites").

[20] Carlos Javier Martinez, Union of Concerned Scientists, "Trump Admin Uses Fossil Fuel Industry Deception Tactics to Undermine Climate Science" (August 13, 2025), https://blog.ucs.org/carlos-martinez/trump-admin-uses-fossil-fuel-industry-deception-tactics-to-undermine-climate-science/.

[21] Shannon Osaka *et al.*, "We fact-checked the Trump administration's climate report," Washington Post (July 31, 2025), https://www.washingtonpost.com/climate-environment/2025/07/31/endangerment-repeal-climate-science-report/.

[22] Ayesha Tandon *et al.*, "Factcheck: Trump's climate report includes more than 100 false or misleading claims," CarbonBrief (August 13, 2025), https://interactive.carbonbrief.org/doe-factcheck/index.html.

[23] Molly Taft, "Scientists Say New Government Climate Report Twists Their Work," Wired (July 30, 2025), https://www.wired.com/story/scientists-say-new-government-climate-report-twists-their-work/ ("But nine scientists across several different disciplines told WIRED that the report mishandled citations of their work by cherry-picking data, misrepresenting findings, drawing erroneous conclusions, or leaving out relevant context."); Gwen Roley, Bill McCarthy and Marisha Goldhamer, "US Energy Department misrepresents climate science in new report," AFP Fact Check (August 1, 2025), https://factcheck.afp.com/doc.afp.com.68KV7WE.

[24] "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies; Republication," 67 Fed. Reg. 8452 (February 22, 2002).

[25] Executive Order 14303, Restoring Gold Standard Science, 90 Fed. Reg. 22601 (May 29, 2025).

[26] Paul Voosen, "Contrarian climate assessment from U.S. government draws swift pushback," Science (July 30, 2025), https://www.science.org/content/article/contrarian-climate-assessment-u-s-government-draws-swift-pushback#:~:text=The%20last%20assessment%20of%20the,a%20pollutant%20EPA%20could%20regulate.

[27] Intergovernmental Panel on Climate Change, AR6 Synthesis Report: Climate Change 2023, https://www.ipcc.ch/report/sixth-assessment-report-cycle/.

[28] *Id.*

The 2023 Fifth National Climate Assessment, produced by the U.S. government as mandated by the Global Change Research Act of 1990,[29] was a similarly massive endeavor, involving "approximately 500 authors, 250 technical contributors, 41 review editors, 13 chapter coordinators, 14 Federal Steering Committee members, 18 peer reviewers, [and] more than 40 staff members," among others.[30] An ad hoc committee of the National Academy of Sciences, Engineering, and Medicine conducted the external peer review.[31] That report totaled 1,834 pages long, more than ten times the length of the DOE report. And, like other credible climate reports, the Fifth National Climate Assessment concluded that "[t]he effects of human-caused climate change are already far-reaching and worsening across every region of the United States. . . . [W]ithout deeper cuts in global net greenhouse gas emissions and accelerated adaptation efforts, severe climate risks to the United States will continue to grow."[32] Notably, the National Climate Assessments have been produced since 2000, as directed by Congress in the Global Change Research Act of 1990[33] and funded in successive appropriations bills. Each report has highlighted the growing threats that global warming poses. Given the existence of five National Climate Assessments produced under the express direction and support of Congress, it is especially concerning that EPA's proposed withdrawal of the 2009 endangerment finding relies not on these Assessments but on a contradictory DOE report generated in eight weeks by five handpicked climate contrarians.

That the DOE Report spouts longstanding fossil fuel industry talking points is not surprising, given the deep ties of the Report's authors to fossil fuel interests. In this way, the Report violates another requirement of the "Restoring Gold Standard Science" executive order: that science be conducted "without conflicts of interest."[34] Author Dr. Roy Spencer, who argues that natural variations in global cloud cover are the primary driver of global warming, is a policy adviser at the Heartland Institute, a conservative group that rejects mainstream climate science.[35] The Heartland Institute has received funding from the Charles G. Koch Foundation,[36] one of several entities affiliated with brothers David and Charles Koch and their fossil fuel-reliant megacorporation Koch Industries.[37] The Heartland Institute has also received funding from

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[29] Pub. L. No. 101-606, 104 Stat. 3096-3104, November 16, 1990.
[30] U.S. Global Change Research Program, Fifth National Climate Assessment (2023), https://toolkit.climate.gov/sites/default/files/2025-07/NCA5_2023_FullReport.pdf.
[31] *Id.*
[32] *Id.* at 1-5.
[33] Pub. L. No. 101-606, 104 Stat. 3096-3104, November 16, 1990.
[34] Executive Order 14303, Restoring Gold Standard Science, 90 Fed. Reg. 22601 (May 29, 2025).
[35] Maxine Joselow, *Trump Hires Scientists Who Doubt the Consensus on Climate Change*, N.Y. Times (Jul. 8, 2025), https://www.nytimes.com/2025/07/08/climate/trump-climate-energy-department.html.
[36] Justin Gillis and Leslie Kaufman, *Leak Offers Glimpse of Campaign Against Climate Science*, N.Y. Times (Feb. 15, 2012), https://www.nytimes.com/2012/02/16/science/earth/in-heartland-institute-leak-a-plan-to-discredit-climate-teaching.html?scp=4&sq=heartland&st=cse.
[37] DeSmog, *Koch Family Foundations and Entities* (accessed August 29, 2025), https://www.desmog.com/koch-family-foundations/. The Koch brothers inherited a vast oil fortune; Koch Industries today is a conglomerate including numerous oil refineries and is one of the country's top 25 corporate carbon and water polluters. Elliott Negin, *It's Time for Charles Koch to Testify About His Climate Change Disinformation Campaign*, Union of Concerned Scientists (March 31, 2022), https://blog.ucs.org/elliott-negin/its-time-for-charles-koch-to-testify-about-his-climate-change-disinformation-campaign/. Since 1997, Koch Family Foundations have given well over $150 million to groups working to undermine climate science and fight efforts to address climate change. *Id.*

ExxonMobil,[38] a longtime funder of climate denialism;[39] DonorsTrust, the "Dark Money ATM of the conservative movement";[40] and Murray Energy, a coal mining company owned by Robert Murray, a Trump donor who drafted a wish list for the President of actions to prop up the coal industry.[41] Dr. Spencer previously worked as a visiting fellow at the Heritage Foundation, which receives funding from DonorsTrust,[42] ExxonMobil,[43] the Koch Family Foundations,[44] and the Sarah Scaife Foundation,[45] whose money comes from the Mellon industrial and oil fortune.[46]

Author Dr. John Christy, a close collaborator of Dr. Spencer's linked as well to the Heartland Institute, [47] is also listed as a contributor[48] on the website of the Competitive Enterprise Institute, "one of the fossil fuel industry's most steadfast allies."[49] The Competitive Enterprise Institute receives funding from the American Fuel & Petrochemical Manufacturers,[50] the Charles Koch Institute,[51] DonorsTrust,[52] the Heritage Foundation,[53] Marathon Petroleum,[54] the National Automobile Dealers Association,[55] and Murray Energy.[56]

Dr. Judith Curry, who charges $400 per hour for her consulting services, counts petroleum companies, electric utilities, and natural gas energy traders among her clients.[57]

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[38] Center for Media and Democracy, SourceWatch, *Heartland Institute* (accessed August 29, 2025), https://www.sourcewatch.org/index.php/Heartland_Institute#Ties_to_the_Koch_Brothers.
[39] Dharna Noor, *New files shed light on ExxonMobil's efforts to undermine climate science*, The Guardian (Sep. 14, 2023), https://www.theguardian.com/us-news/2023/sep/14/exxonmobil-documents-wall-street-journal-climate-science.
[40] Andy Kroll, *Exposed: The Dark-Money ATM of the Conservative Movement*, Mother Jones (Feb. 5, 2013), https://www.motherjones.com/politics/2013/02/donors-trust-donor-capital-fund-dark-money-koch-bradley-devos/
[41] Lisa Friedman, *A Coal Baron Funded Climate Denial as His Company Spiraled Into Bankruptcy*, N.Y. Times (Dec. 17, 2019), https://www.nytimes.com/2019/12/17/climate/murray-energy-climate-denial-coal.html.
[42] DeSmog, *The Heritage Foundation* (accessed Aug. 11, 2025), https://www.desmog.com/heritage-foundation/.
[43] *Id.*
[44] *Id.*
[45] *Id.*
[46] DeSmog, *Scaife Family Foundations* (accessed Aug. 8, 2025), https://www.desmog.com/scaife-family-foundations/.
[47] The Heartland Institute, *Who We Are: John Christy* (accessed Aug. 8, 2025), https://web.archive.org/web/20160915223034/https://www.heartland.org/about-us/who-we-are/john-christy.
[48] Competitive Enterprise Institute, Contributor: Dr. John R. Christy (2014), http://web.archive.org/web/20160916201926/https://cei.org/contributor/dr-john-r-christy.
[49] John H. Cushman Jr., *Think Tank With Fossil-Fuel Ties Subpoenaed in AG's Climate Inquiry*, Inside Climate News (Apr. 8, 2016), https://insideclimatenews.org/news/08042016/think-tank-fossil-fuel-ties-competitive-enterprise-institute-subpoena-attorney-general-climate-change-exxon/.
[50] Tik Root, Lisa Friedman and Hiroko Tabuchi, *Following the Money That Undermines Climate Science*, N.Y. Times (Jul. 10, 2019), https://www.nytimes.com/2019/07/10/climate/nyt-climate-newsletter-cei.html.
[51] *Id.*
[52] CEI fundraiser program https://int.nyt.com/data/documenthelper/1366-cei-gala-program/1438e537f20a04a672f6/optimized/full.pdf (cited and linked in Tik Root, Lisa Friedman and Hiroko Tabuchi, *Following the Money That Undermines Climate Science*, N.Y. Times (Jul. 10, 2019), https://www.nytimes.com/2019/07/10/climate/nyt-climate-newsletter-cei.html).
[53] *Id.*
[54] *Id.*
[55] *Id.*
[56] Friedman, *supra* n. 41.
[57] Dana Drugmand, *Montana Is Paying a Climate Denier to Give Expert Testimony in Upcoming Trial*, DeSmog (May 15, 2023), https://www.desmog.com/2023/05/15/judith-curry-denier-montana-climate-trial/.

Another author, Dr. Steven Koonin, previously worked as a scientist for the oil and gas company British Petroleum,[58] and he currently serves as a fellow at the Hoover Institution, a conservative-leaning research organization that has received funding from ExxonMobil;[59] DonorsTrust,[60] and the Sarah Scaife Foundation.[61] Notably, Dr. Koonin was the architect of the ill-fated 2017 proposal, during the first Trump Administration, to create a "red team" to dispute mainstream climate science.[62] Finally, Dr. Ross McKitrick is an employee at the CATO Institute, which was co-founded by Charles Koch and also receives funding from DonorsTrust,[63] ExxonMobil,[64] Murray Energy,[65] and the Scaife Family Foundations;[66] and he is a Senior Fellow at the libertarian think tank the Fraser Institute,[67] which receives funding from the Charles G. Koch Foundation,[68] ExxonMobil,[69] and the Sarah Scaife Foundation.[70]

It is no coincidence that the same funders appear again and again. They are part of a multi-decadal deception campaign spearheaded by Big Oil to undermine efforts to curb greenhouse gas emissions.[71] The rampant conflicts of interest shared by the five authors of the DOE Report are disqualifying on their face.

Nor did the authors make any attempt to mitigate their conflicts by engaging experts inside or outside the United States government to test their findings. There is no mention of consultation with the relevant agencies in the Department of Agriculture, the Department of the Interior, or the Department of Commerce let alone independent experts. Yet the Report makes significant claims in several areas where the authors do not have clear expertise and where DOE would normally have relied on expertise in sister agencies. For example, the Report cites a University of Rutgers study as the primary source for positing that snow cover "if anything" is increasing in the Northern Hemisphere.[72] Meanwhile, the current EPA website utilizing NOAA data shows snow pack is in fact decreasing over time.[73] Other scholars confirm NOAA's finding

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[58] Joselow, *supra* n. 35.
[59] DeSmog, *Hoover Institution* (accessed Aug. 11, 2025), https://www.desmog.com/hoover-institution/.
[60] *Id.*
[61] *Id.*
[62] Brad Plumer and Coral Davenport, *E.P.A. to Give Dissenters a Voice on Climate, No Matter the Consensus*, New York Times (June 30, 2017), https://www.nytimes.com/2017/06/30/climate/scott-pruitt-climate-change-red-team.html.
[63] Kroll, *supra* n. 40.
[64] Exxon Worldwide Giving Reports, collected here: https://web.archive.org/web/20201003142608/www.exxonsecrets.org/html/orgfactsheet.php?id=21.
[65] Friedman, *supra* n. 41.
[66] DeSmog, *Scaife Family Foundations* (accessed Aug. 8, 2025), https://www.desmog.com/scaife-family-foundations/.
[67] Fraser Institute, *Biography of Ross McKitrick* (accessed Aug. 8, 2025), https://www.fraserinstitute.org/profile/ross-mckitrick.
[68] DeSmog, Fraser Institute (accessed Aug. 11, 2025), https://www.desmog.com/fraser-institute/.
[69] *Id.*
[70] *Id.*
[71] Joint Staff Report, House Committee on Oversight and Accountability Democrats and Senate Committee on the Budget, "Denial, Disinformation, and Doublespeak: Big Oil's Evolving Efforts to Avoid Accountability for Climate Change" (April 2024), https://www.budget. senate.gov/imo/media/doc/fossil_fuel_report1.pdf.
[72] DOE Report, supra n. 5 at 39-40.

in peer-reviewed studies.[74] In another example, the Report claims "there is no evidence of increasing meteorological drought frequency or intensity in the U.S."[75] By contrast, the Bureau of Reclamation has completed multiple basin studies which actually quantify the loss of water to drought due to climate change.[76] Again, other scholars confirm this finding.[77] The Report repeatedly cherry-picks sources that support the desired outcome and agenda of the authors, and ignores readily-available research to the contrary in Congressionally-directed Assessments, sister agency science, and the vast majority of peer-reviewed literature in this field. There is nothing serious or reliable about the authors or the process they followed to produce this Report.

Finally, the DOE Report's denial of the economic costs of climate change on the American people and economy[78] is flatly inconsistent with reality. Americans are already facing severe costs due to climate change, and those costs are only predicted to grow, costing every child born in 2024 a tax of around $500,000 over their lifetime.[79] For instance, climate change continues to increase the frequency and severity of natural disasters.[80] These include the July 2025 Texas flooding, which "was marked by the type of extremely intense, highly localized downpour that is becoming much more common due to global warming."[81] Climate change causes a wide range of health problems, with health care costs related to the combustion of fossil fuels already estimated to total nearly $820 billion in the U.S. annually.[82] It drives food insecurity by causing declines in agricultural productivity, food safety issues, and disruptions in food distribution.[83] Droughts in California and Arizona in 2022 caused vegetable prices in the United States to spike by 80% over the previous year.[84] As noted at the outset of this comment, weather disasters cost American farmers more than $42 billion in crop and rangeland losses in

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[73] EPA, Climate Change Indicators: Snowpack, https://www.epa.gov/climate-indicators/climate-change-indicators-snowpack (last updated August 25, 2025).
[74] Siirila-Woodburn, *et al. A low-to-no snow future and its impacts on water resources in the western United States*, Nat. Rev. Earth & Environ. (2021).
[75] DOE Report, supra n. 5 at 69.
[76] Bureau of Reclamation, Completed Basin Studies, https://www.usbr.gov/watersmart/bsp/completed.html (last updated May 30, 2025).
[77] *See*, *e.g.*, Yizhou Zhuang, *et. al., Anthropogenic warming has ushered in an era of temperature-dominated droughts in the western United States,* Science Advances 10 (2024).
[78] DOE Report, supra n. 5 at 116-25.
[79] Scott Medintz, *Climate Change could cost each American born today $500,000,* Consumer Reports (Apr. 16, 2024), https://www.consumerreports.org/home-garden/climate-change/the-per-person-financial-cost-of-climate-change-a6081217358/.
[80] NASA, Extreme Weather and Climate Change, https://perma.cc/Z6MR-9XHK.
[81] Hayley Smith, *Texas flood highlights deadly climate risk from extreme weather*, Los Angeles Times (July 6, 2025), https://www.latimes.com/environment/story/2025-07-06/texas-flood-paints-a-stark-picture-of-a-future-without-noaa.
[82] Senate Budget Committee, Staff Report, Uncovering the Economic Costs of Climate Change (December 2024), https://www.budget.senate.gov/imo/media/doc/uncovering_the_economic_costs_of_climate_change.pdf.
[83] Alisher Mirzabaev *et al.*, *Severe climate change risks to food security and nutrition*, Clim. Risk Manag. (2023), https://www.sciencedirect.com/science/article/pii/S2212096322000808#:~:text=The%20climate%20change%20risk%20to,populations%20already%20vulnerable%20to%20food.
[84] Maximilian Kotz, Markus Donat, Tom Lancaster *et al.*, *Climate extremes, food price spikes, and their wider societal risks*, Environmental Research Letters (July 21, 2025), https://iopscience.iop.org/article/10.1088/1748-9326/ade45f.

2023 ($21.94 billion) and 2024 ($20.3 billion).[85] Climate-intensifying natural disasters are also contributing to skyrocketing insurance non-renewal rates,[86] which in turn are causing a "climate-insurance bubble" affecting a third of American homes.[87] These costs—and countless others that the DOE Report ignores—cause national impacts that threaten our entire financial system.[88] Federal Reserve Bank Chairman Jerome Powell testified to the Senate Committee on Banking in March 2024 that:

> [i]nsurance of various different kinds—housing insurance, but also automobile insurance, and things like that—[have] been a significant source of inflation over the last few years. … [C]ompanies are withdrawing from writing insurance in some coastal areas. And you've got to think 10 years from now, how are you going to get housing insurance? And … it's a significant issue.[89]

Because insurance is essential to obtaining a mortgage, more properties will become unmortgeable—and thus, unsellable—as the impacts of climate change continue to mount.[90] As a result, property values will decline, eroding the value of what is often the most valuable asset for an American family.[91] This is on top of property value losses that will be directly attributable to sea level rise and coastal flooding – which even the Report reluctantly acknowledges is happening. As Dr. Sean Becketti, former Chief Economist at Freddie Mac, testified before the Senate Budget Committee in 2023:

> You look at the Housing Crisis of 2007/8, it was a long time before property values came back, but they did come back. But this is a different type of dynamic where *property values are probably physically not able to come back.* And so this is equity that's lost forever. It's extremely difficult to estimate [total losses] nationally – *I'm not sure I have enough zeros to do it.*"[92]

Globally, "climate change and the fight against it could wipe out 9% of the value of the world's housing by 2050—which amounts to $25 [trillion]."[93] The resulting contraction is expected to cause cascading economic effects that would pose fundamental threats to the financial system, both in the United States and globally."[94]

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[85] See supra at 1, note 6.
[86] Senate Budget Committee, Next to Fall, supra n. 7, at 5
[87] *Global Warming is Coming for your Home*, The Economist, supra n. 8.
[88] Senate Budget Committee, Next to Fall, supra n. 7.
[89] *The Semiannual Monetary Policy Report to the Congress: Hearing Before the Senate Comm. on Banking, Hous., and Urban Aff.*, 118th Cong. (March 7, 2024) (statement of Jerome H. Powell, Chair, Board of Governors of the Federal Reserve System), https://www.congress.gov/118/chrg/CHRG-118shrg58305/CHRG-118shrg 58305.pdf.
[90] Lindsay Fenlock et al., *Climate Crisis Triggers Dangerous Domino Effect: Insurance, Housing, Financial Crises*, Center for International Environmental Law (July 23, 2024), https://www.ciel.org/climate-crisis-domino-effect/.
[91] Senate Budget Committee, Next to Fall, supra n. 7, at 5.
[92] *Rising Seas, Rising Costs: Climate Change and the Economic Risks to Coastal Communities; Hearing Before the Senate Comm. On Budget*, 118th Cong. (March 1, 2023), https://www.budget.senate.gov/hearings/rising-seas-rising-costs-climate-change-and-the-economic-risks-to-coastal-communities (live testimony) (emphasis added).
[93] *Global Warming is Coming for your Home*, The Economist, supra n. 8.
[94] Senate Budget Committee, Next to Fall, supra n. 7, at 6-7.

The DOE Report's callous dismissal of these well-documented costs that threaten the prosperity, health, and well-being of all Americans is yet another reason why the Report cannot and must not be relied on for any decisionmaking, whether by Federal agencies; State, local, or Tribal agencies; or the private sector. The Report should be withdrawn, and frankly, withdrawn in shame. This so-called Report puts the imprimatur of government on what is likely the largest fraudulent operation in American history. No amount of donor money from fossil fuel industry sources to President Trump or the Republican Party should be worth that.

Sincerely,

Sheldon Whitehouse
United States Senator
Ranking Member
Committee on Environment
and Public Works

Patty Murray
Vice Chair
Senate Committee on
Appropriations