



September 2nd, 2025

Secretary Chris Wright  
Department of Energy  
1200 Pennsylvania Ave NW, Washington, DC 20004  
Washington, DC

Submitted via <https://www.regulations.gov/commenton/DOE-HQ-2025-0207-0001>

Dear Secretary Chris Wright,

**RE: Comments on Docket Number DOE-HQ-2025-0207:**  
**“A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate”**

Thank you for the opportunity to submit the following comments in reference to the Department of Energy’s (DOE) report; “A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate”. WE ACT and the undersigned organizations submit the following comments. We oppose the premise and key findings of this climate report and urge the DOE to reassess its methodology, engage meaningfully with impacted communities, and incorporate environmental justice principles into all future analyses and decision-making processes. We call for greater transparency, inclusive stakeholder engagement, and a commitment to science that reflects the lived realities of frontline populations.

**About WE ACT and the Environmental Justice Leadership Forum**

WE ACT for Environmental Justice (“WE ACT”) is a Northern Manhattan-based member organization whose mission is to advocate for and build healthy communities by ensuring communities of color and low income communities lead in creating just and equitable environmental health laws, policies, and practices.<sup>1</sup> Since its founding in 1988, WE ACT has worked to serve environmental justice communities across the country which have been and continue to be adversely affected by harmful infrastructure, pollution, and the inequitable enforcement of environmental laws. WE ACT consistently calls for strong environmental protections and actions that address and remediate historical burdens.

WE ACT’s Federal Policy Office in Washington, D.C. pursues national policy solutions that take into account the positions and voices of environmental justice organizations across the

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<sup>1</sup> WE ACT for Environmental Justice, “Who we Are,” WE ACT Website, Aug. 4, 2023, <https://www.weact.org/whoweare/ourstory/>.

country. The Federal Policy Office addresses injustice and equity within the federal landscape and seeks to drive just and equitable solutions in the realms of clean air, clean water, climate, transportation, and energy justice, as well as the creation of healthy homes and other issue areas. Lastly, WE ACT hosts the Environmental Justice Leadership Forum (EJLF), a national coalition of 40 environmental justice organizations across 23 states working together to advance climate justice and impact policy to ensure the health and well-being of communities of color and low-income communities throughout the United States.<sup>2</sup>

## Climate Change Hits Environmental Justice Communities the Hardest

The science is settled and unequivocal. Comprehensive reviews of the scientific research undertaken by climate scientists, such as the Intergovernmental Panel on Climate Change (IPCC) assessment reports, the National Climate Assessments compiled by the US federal government, and countless other studies by scientific organizations all have characterized the catastrophic impacts from anthropogenic climate change. These impacts include but are not limited to: more frequent and severe natural disasters such as heat waves, hurricanes and droughts, an overall decrease in global food security, and ever increasing chances of triggering a tipping point resulting in sudden and devastating changes to our global systems.<sup>3</sup>

Despite the fact that climate change impacts are widely understood and felt by most, our government has been slow to, at times even outright oppositional, to reducing greenhouse gas (GHG) emissions. In 2023, the United States emitted nearly 16 gigatons of GHGs, accounting for 11% of emissions, and making it the second largest contributing country in the world.<sup>4</sup> When adopting an approach which incorporates each country's fair share of emissions and historical contributions, the United States leads the world in responsibility for overshooting emissions, accounting for 40% of all global excess emissions.<sup>5</sup> Our nation's role as a leading contributor to the breakdown of global climate pollution underscores its duty to reduce its emissions.

These impacts are not felt equally across the world, the U.S, or even regionally. Instead, they will disproportionately burden communities of color and low-income populations. Our members, and environmental justice communities at large, are already living with the consequences firsthand. They know these damages not as distant projections, but as daily realities. To illustrate, a comprehensive global assessment of high-intensity weather events between 1975 and 2008 revealed that 23 of nearly 9,000 major events reported in this period were responsible for 1.8 million deaths, with an overwhelming toll of these deaths, 500,000,

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<sup>2</sup> Environmental Justice Leadership Forum, "About Us," accessed August 29, 2025, <https://ejforum.org/about-us/>

<sup>3</sup> Calvin, K., Dasgupta, D., Krinner, G., Mukherji, A., Thorne, P. W., Trisos, C., Romero, J., Aldunce, P., Barrett, K., Blanco, G., Cheung, W. W. L., Connors, S., Denton, F., Diongue-Niang, A., Dodman, D., Garschagen, M., Geden, O., Hayward, B., Jones, C., ... Péan, C. (2023). *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.* (First). Intergovernmental Panel on Climate Change (IPCC). <https://doi.org/10.59327/IPCC/AR6-9789291691647>

<sup>4</sup> European Commission. Joint Research Centre. & IEA. (2024). *GHG emissions of all world countries*. Publications Office. <https://data.europa.eu/doi/10.2760/4002897>

<sup>5</sup> Hickel, J. (2020). Quantifying national responsibility for climate breakdown: An equality-based attribution approach for carbon dioxide emissions in excess of the planetary boundary. *The Lancet Planetary Health*, 4(9), e399–e404. [https://doi.org/10.1016/S2542-5196\(20\)30196-0](https://doi.org/10.1016/S2542-5196(20)30196-0)

falling among impoverished communities.<sup>6</sup> As of mid-2025, the United States has experienced a significant increase in severe weather events, already resulting in an estimated \$12 billion in damages between January and June.<sup>7</sup> The U.S. Environmental Protection Agency's (EPA's) own climate vulnerability assessment found that: 1) amongst Hispanic and Latino individuals, 43% more likely to live in areas with the highest projected labor losses; 2) 48% of Native Americans are more likely to live in areas that will be inundated due to sea level rise, and 3) 40% of Black individuals are more likely to live in the areas with the highest projected increases in mortality rates.<sup>8</sup>

At the state level, these disparities can also be seen. In New York, where WE ACT is headquartered, the New York State Disadvantaged Communities Criteria reveal that the majority of residents in neighborhoods with the highest levels of heat vulnerability—classified as Heat Vulnerability Index 4 and 5—are concentrated in environmental justice areas. This underscores the intersection of climate risk and systemic inequity, where historically marginalized communities face the greatest exposure to extreme heat.”<sup>9</sup> As sure as climate change will bring severe and far-reaching disruptions to our global systems, it is as certain that its most severe impacts will and are falling on environmental justice communities. It is on this foundation that WE ACT, alongside the broader environmental justice movement, asserts our rightful place as essential stakeholders in all climate-related discourse, research, and policymaking. Our voices are not optional—they are indispensable to crafting equitable and effective solutions.

Given the facts, we strongly endorse and advocate transitioning our energy system away from fossil fuels that drive the climate crisis toward clean, renewable technologies. Anything short of this transition will result in further catastrophic harm to our communities. Additionally, we emphasize that any report on climate change that the DOE or any other agency produces must accept the overwhelming scientific literature that backs the existence and threat of climate change. Any denial of climate change, as this report purports, is not just reckless profiteering or wilful negligence, but is also an erasure of environmental justice communities, continuing a cycle of injustices placed on Black, Brown, and low-income communities.

## **Validity of the Report is Questionable**

Unfortunately, the validity of the report created by DOE's "Climate Working Group"(CWG) is not a comprehensive analysis and review of the entirety of the body of scientific work detailing anthropogenic climate change and its impacts. In fact, the credibility of the report must be called into question due to its exclusion of climate scientists, public health experts, environmental justice advocates, and other reputable stakeholders in favor of a small cohort of long-time climate skeptics and deniers. These authors have cherry picked various studies, taken

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<sup>6</sup> Scovronick, N., Lloyd, S. J., & Kovats, R. S. (2015). Climate and health in informal urban settlements. *Environment & Urbanization*, 27(2), 657-678. <https://doi.org/10.1177/0956247815596502>

<sup>7</sup> Masters, J (2025, July 16) U.S. Socked with 15 billion-dollar weather disasters during the 1<sup>st</sup> half of 2025. Yale Climate Connections. [https://yaleclimateconnections.org/2025/07/u-s-socked-with-15-billion-dollar-weather-disasters-during-the-1st-half-of-2025/#:~:text=The%20U.S.%20suffered%2012%20billion,U.S.%20that%20cost%20\\$9.5%20billion.](https://yaleclimateconnections.org/2025/07/u-s-socked-with-15-billion-dollar-weather-disasters-during-the-1st-half-of-2025/#:~:text=The%20U.S.%20suffered%2012%20billion,U.S.%20that%20cost%20$9.5%20billion.)

<sup>8</sup> U.S. Environmental Protection Agency Headquarters. (2021, September). Climate Change and Social Vulnerability in The United States [Announcements and Schedules]. <https://www.epa.gov/cira/social-vulnerability-report>

<sup>9</sup> New York City Mayor's office of Sustainability. (2025). Environmental Justice in NYC: 2025 update. [https://climate.cityofnewyork.us/wp-content/uploads/2025/04/EJNYC\\_Report.pdf](https://climate.cityofnewyork.us/wp-content/uploads/2025/04/EJNYC_Report.pdf)

these works out of context, and made assertions that the cited study's authors vehemently disagree with.<sup>10,11</sup> In the DOE Secretary's forward, he states the following;

"I didn't select these authors because we always agree—far from it. In fact, they may not always agree with each other. But I chose them for their rigor, honesty, and willingness to elevate the debate. I exerted no control over their conclusions. What you'll read are their words, drawn from the best available data and scientific assessments."

An objective analysis of the reports claims within the context of existing comprehensive assessments of anthropogenic climate change, such as the National Climate Assessment (NCA) and Intergovernmental Panel on Climate Change's reports, strongly suggests that the authors' views were, in fact, the primary basis for their inclusion to draft this document.<sup>12</sup> As the scientific literature demonstrates a 99% consensus on human-caused climate change,<sup>13</sup> the chances that not just one but all five individuals holding contrary views is extremely low. Such uniform dissent strongly suggests a deliberate selection process rather than a random occurrence. Additionally, the refusal to draw upon the existing and comprehensive work of the NCA while claiming that this report "faithfully represents the state of climate science today" raises serious doubts about its credibility and rigor. Recent statements made by Secretary Wright have indicated the administration is in the process of altering prior iterations of the NCA he finds "objectionable" and clearly illustrate a pattern of promoting a narrative that is divorced from the scientific reality.<sup>14</sup>

To further these concerns, the Union of Concerned Scientists and the Environmental Defense Fund recently filed a lawsuit calling out that the secretive process in which the report was drafted violated the Federal Advisory Committee Act (FACA). This development signals that the actions of DOE surrounding this report were not only unethical and misleading, but also illegal. As of writing, this report has been quoted 22 times in the effort to roll back EPA's long standing endangerment finding.<sup>15</sup> The EPA's extensive reference to the report prior to the public release of the proposed rule to rescind the endangerment finding indicates a level of pre-endorsement that calls into question the objectivity and transparency of DOE's report. It is imperative that this report be withdrawn and thoroughly revised with meaningful input from reputable climate scientists, public health experts, environmental justice communities, and the broader public. Only through inclusive and evidence-based collaboration can we ensure the report reflects the urgency and integrity that the climate crisis demands. The process in which

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<sup>10</sup> Hausfather, Z. (2025, March 24). *How the DOE and EPA used and misused my research*. <https://www.theclimatebrink.com/p/how-the-doe-and-epa-used-and-misused>

<sup>11</sup> Zinin, A. (2025, August 1). *US Energy Department misrepresents climate science in new report*. <https://phys.org/news/2025-08-energy-department-misrepresents-climate-science.html>

<sup>12</sup> Paul Voosen. (2025, July 30). *Contrarian climate assessment from U.S. government draws swift pushback*. <https://www.science.org/content/article/contrarian-climate-assessment-u-s-government-draws-swift-pushback>

<sup>13</sup> Lynas, M., Houlton, B. Z., & Perry, S. (2021). Greater than 99% consensus on human caused climate change in the peer-reviewed scientific literature. *Environmental Research Letters*, 16(11), 114005. <https://doi.org/10.1088/1748-9326/ac2966>

<sup>14</sup> Ella Nilsen. (2025, August 7). Energy chief suggests Trump administration is altering previously published climate reports. *CNN*. <https://www.cnn.com/2025/08/07/climate/wright-national-climate-assessments-updating>

<sup>15</sup> Ashley Siefert Nunes. (2025, August 12). *EDF, UCS File Lawsuit Against Trump Administration Secret Convening of Climate Skeptics, Use of Their Hidden "Science" Report in Attempt to Overturn Endangerment Finding | Union of Concerned Scientists*. <https://www.ucs.org/about/news/edf-ucs-file-lawsuit-against-trump-administration-secret-convening-climate-skeptics-0>

this report was developed not only falls short of our best practices surrounding public engagement<sup>16</sup>, but seems to have been developed to intentionally limit public participation as much as possible. These concerns alone are reason enough to render the report invalid as a credible source for any policy or government decision-making.

## **The Real Burden Is Unchecked Climate Harm—Not the Cost of Solutions**

In regards to content, already several scientists whose work was cited have come out to state that their findings were fundamentally misrepresented.<sup>17,18</sup> We support the myriad of researchers that have come out to correct the over 100 false and misleading claims and misuses of their work in this report.<sup>19</sup> For the purposes of our comment, we choose to focus our attention on the key finding and claim that costs of climate mitigation are somehow more economically burdensome than unmitigated climate change.

For decades, environmental justice organizations have emphasized the need for climate forward, environmental justice centered policies to address the burdens of environmental racism and redress historical harms. These disproportionate burdens manifest through economic, public health, and other reductions in quality of life. In the U.S, a country in which we collectively spend double the average on medical care when compared to other high income countries,<sup>20</sup> detrimental health impacts impose a significant economic burden: particularly on marginalized groups.<sup>21</sup>

Whether in the transportation, power, or industrial sectors, WE ACT and the wider environmental justice movement have always advocated to reduce GHGs and harmful co-pollutant emissions that burden communities. Across all stages of the oil and gas production cycle, 91,000 people each year die prematurely due to air pollution with a disproportionate share of these deaths being marginalized identities.<sup>22</sup> Additionally, when compared to the ongoing and projected costs the necessity for these policies become even more stark. Already the health costs of air pollution and climate change exceed \$800 billion per year with costs only projected to increase.<sup>23</sup> A just transition is essential, not only as a strategy to confront climate

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<sup>16</sup> WE ACT for Environmental Justice, “Community Engagement Brief: Ensuring environmental justice communities participate in decision-making on Justice40 Initiative and beyond.”2022.

<https://www.weact.org/wp-content/uploads/2022/10/Community-Engagement-Brief-092322-FINAL.pdf>

<sup>17</sup> Taft, M. (n.d.). Scientists Say New Government Climate Report Twists Their Work. *Wired*. Retrieved August 19, 2025, from <https://www.wired.com/story/scientists-say-new-government-climate-report-twists-their-work/>

<sup>18</sup> See footnote 7

<sup>19</sup> Ayesha Tandon, Leo Hickman, Cecilia Keating, & Robert McSweeney. (2025, August 14). *Factcheck: Trump’s climate report includes more than 100 false or misleading claims*. Carbon Brief. <https://interactive.carbonbrief.org>

<sup>20</sup> Papanicolaou, I., Woskie, L. R., & Jha, A. K. (2018). Health Care Spending in the United States and Other High-Income Countries. *JAMA*, 319(10), 1024–1039. <https://doi.org/10.1001/jama.2018.1150>

<sup>21</sup> LaVeist, T. A., Pérez-Stable, E. J., Richard, P., Anderson, A., Isaac, L. A., Santiago, R., Okoh, C., Breen, N., Farhat, T., Assenov, A., & Gaskin, D. J. (2023). The Economic Burden of Racial, Ethnic, and Educational Health Inequities in the US. *JAMA*, 329(19), 1682–1692. <https://doi.org/10.1001/jama.2023.5965>

<sup>22</sup> Vohra, K., Marais, E. A., Achakulwisut, P., Anenberg, S., & Harkins, C. (2025). The health burden and racial-ethnic disparities of air pollution from the major oil and gas lifecycle stages in the United States. *Science Advances*, 11(34), eadu2241. <https://doi.org/10.1126/sciadv.adu2241>

<sup>23</sup> Donald De Alwis & Dr. Vijay S. Limaye. (2021). *The Costs of Inaction: The Economic Burden of Fossil Fuels and Climate Change on Health in the United States*. Natural Resources Defense Council & Medical Society Consortium on Climate & Health. <https://www.nrdc.org/press-releases/report-health-costs-climate-change-and-fossil-fuel-pollution-tops-820-billion-year>



change, but as a powerful opportunity to address and rectify the deep-rooted injustices that have long burdened frontline communities.

Examples of the health and economic benefits accompanying the clean energy transition can be seen in numerous sectors. In transportation, the American Lung Association (ALA) estimates that if fleets move towards zero-emission trucks by 2050, the nation could see cumulative benefits that include: \$735 billion in public health benefits due to cleaner air coupled with 66,800 fewer premature deaths, 1.75 million fewer asthma attacks and 8.5 million fewer lost workdays.<sup>24</sup> These benefits could be further amplified with an expansion of public transportation, which in turn could save urban households \$2,000 per year<sup>25</sup> and save 84,000 lives from traffic fatalities by 2050.<sup>26</sup> In the power sector, the Mercury and Air Toxics Standards alone, which the administration is also attempting to roll back<sup>27</sup>, will avoid up to 1,200 premature deaths, 870 hospital and emergency room visits, 1,900 cases of asthma onset, 360,000 cases of asthma symptoms, 48,000 missed school days, and 57,000 lost workdays in just 2035.<sup>28, 29</sup> These examples are not meant to be exhaustive, but instead highlight the beneficial health and resulting economic benefits that can be achieved through environmental justice centered, climate policies.

## Conclusion

WE ACT with UCLA students recently published a StoryMap highlighting the devastation from the Eaton Fire which burned over 9,000 structures in Altadena, California, including ten churches, five schools, and many small businesses.<sup>30</sup> This predominantly Black community already struggling with an affordability crisis, now faces numerous additional compounding challenges produced by climate change. In attempting to manufacture disinformation to legitimize their erasure of climate change from federal policy, the DOE also deliberately ignores the plights of communities like those in Altadena. On its first day in power, the administration issued its Diversity, Equity and Inclusion (DEI) executive order<sup>31</sup> in an attempt to set back the

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<sup>24</sup> American Lung Association. (2022). *Delivering Clean Air: Health Benefits of Zero-Emission Trucks*.

<https://www.lung.org/clean-air/electric-vehicle-report/delivering-clean-air>

<sup>25</sup> The High Cost of Transportation in the United States. (2024). Institute for Transportation and Development Policy.

<https://itdp.org/2024/01/24/high-cost-transportation-united-states/>

<sup>26</sup> *Reducing Costs, Commutes, and Climate Pollution: State Solutions for Better Transportation*. (2025). Clean Rides Network.

<https://static1.squarespace.com/static/66dcb2887978724e30d73dda/t/67dd87b54cac1f2d5d588943/1742571452358/Reducing+Costs%2C+Commutes%2C+and+Climate+Pollution+%5BFinal%5D.pdf>

<sup>27</sup> WE ACT for Environmental Justice. (n.d.). WE ACT Testimony for Environmental Protection Agency's Hearing on the Mercury and Air Toxics Standards (MATS). *WE ACT for Environmental Justice*. Retrieved August 28, 2025, from <https://weact.org/updates/mats-2025-testimony/>

<sup>28</sup> EPA (2024). Regulatory Impact Analysis for the Final National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review.

<https://www.epa.gov/system/files/documents/2024-04/2024-mats-rtr-final-ria-final.pdf>

<sup>29</sup> EPA (2024). Biden-Harris Administration Finalizes Suite of Standards to Reduce Pollution from Fossil Fuel-Fired Power Plants.

<https://www.epa.gov/newsreleases/biden-harris-administration-finalizes-suite-standards-reduce-pollution-fossil-fuel>

<sup>30</sup> Carol Loupeda, Jana Saadeh, & Lana Diep. (2025). "You can taste the fire": Eaton and the Endangerment Finding. WE ACT for Environmental Justice. <https://storymaps.arcgis.com/stories/45b5162b8a514d69b0db52335c3ad111>

<sup>31</sup> Exec. Order No.14151 3 C.F.R., 90 FR 8339 (2025).

<https://www.federalregister.gov/documents/2025/01/29/2025-01953/ending-radical-and-wasteful-government-dei-programs-and-preferencing>

racial progress made over the past few decades. What followed were efforts to fire environmental justice staff, renege on grants and remove terms such as "environmental justice" and "equity". Unfortunately, this report is the latest in a long line of actions the administration has taken to fabricate its own reality and ultimately ignore the defining issues of our time.

The DOE and the participating authors have betrayed the principles of good science and good governance by misconstruing the scientific literature to produce a predetermined outcome. This report through its cherry picked data, misrepresentation of the work of numerous researchers, and its exclusion of climate scientists, public health experts, environmental justice advocates, and other reputable stakeholders serves only as a disservice to us all. Climate forward, environmental justice centered policies can address the burdens of environmental racism, provide numerous benefits to the population, and mitigate the worst impacts of the climate crisis. Promoting an alternative narrative does not make this reality of the climate crisis any less factual; it only results in DOE failing its mission to ensure America's security and prosperity by addressing energy, environmental, and nuclear challenges through transformative science and technology solutions. In the interest of environmental justice communities, this country, and the world as a whole, we urge DOE to retract this damaging and misleading report.

Respectfully submitted,

GreenLatinos

Duwamish River Community Coalition

Memphis APRI

North Carolina Environmental Justice Network

North Carolina Climate Justice Collective

PODER Austin

RISE for Environmental Justice

Texas Environmental Justice Advocacy Services

West End Revitalization Association

WE ACT for Environmental Justice