



National Tribal Air Association

Fact Sheet

A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate: docket number DOE-HQ-2025-0207

*The comment deadline is **September 2, 2025**. Your comment letter can be submitted electronically to the Federal Rulemaking Portal. <https://www.regulations.gov/> at docket number DOE-HQ-2025-0207*

Background

On July 29, 2025, the Department of Energy (DOE) issued a draft report titled “A Critical Review of Impacts of Greenhouse Gas Emissions (GHG) on the U.S. Climate.” The report was developed by DOE's 2025 Climate Working Group (CWG), a group of five scientists assembled by Energy Secretary Chris Wright with diverse expertise in physical science, academic research, and climate science. The landing page for the CWG Report, including a press release, can be found here: www.energy.gov/topics/climate.

What is the purpose of the Report

The stated purpose of the draft report is to review scientific certainties and uncertainties in how anthropogenic carbon dioxide (CO₂) and other greenhouse gas emissions have affected, or will affect, the Nation's climate, extreme weather events, and selected metrics of societal well-being. Those emissions are increasing the concentration of CO₂ in the atmosphere through a complex and variable carbon cycle, where some portion of the additional CO₂ persists in the atmosphere for centuries.

The draft report is extremely limited in scope and only identifies areas where there are “uncertainties” in the body of climate science. It cherry picks and misinterprets data to raise concern and call into question the broader accepted body of science that has undergone peer review and international scrutiny.

The draft report is silent on the impacts of climate change on Tribes and Alaskan Natives. It minimizes the impact of climate change on ocean acidification and is silent on the impact of rising ocean temperatures on most ocean ecosystems.

The draft report calls into question the climate change models, often misinterpreting the underlying science.

The draft report rejects the increase in severe weather events, including floods, hurricanes, and wildfires, as linked to climate change.

The draft report states that any national policy would have little effect in addressing climate change and does not justify the cost.

How might the Proposed Rule affect my Tribe?

This report is being used to justify the US EPA's rescission of the 2009 endangerment finding. If rescinded, the EPA would no longer have the authority to justify the regulation of greenhouse gasses from all sources.

This would also justify removing funding from American Indian Tribes and Alaskan Natives for GHG reduction activities and mitigation planning.

Rescinding the Endangerment Finding would further the public health and environmental cost and impacts on Tribal subsistence by preventing measures to address climate change.

National Tribal Air Association

The National Tribal Air Association (NTAA) has a lengthy and effective history of supporting air quality management policies and programs, consistent with the needs, interests, and unique legal status of American Indian Tribes and Alaskan Natives. This history includes extensive advocacy for protecting air quality and the insidious impacts of greenhouse gas emissions. Many reports, educational materials, and policy recommendations relating to the Proposed Rule can be found at www.ntaatribalair.org. Relevant resource materials regarding Tribes and climate change can be found at The Institute for Tribal Environmental Professionals Tribal Climate Program: <https://www7.nau.edu/itep/main/tcc/>.

The NTAA opposes the draft report and recommends that DOE perform a comprehensive review and revision to that report to evaluate the particular impacts from GHG emissions on Native Nations and Tribal communities. The NTAA also recommends DOE offer consultation to Tribes on this report.

How to Comment on the Report:

Submit comments using the Federal eRulemaking Portal at www.regulations.gov under docket number DOE-HQ-2025-0207.

Comments are due on September 2, 2025.

To Learn More

Any questions can be directed to the NTAA Program Manager, Miranda O'Neill, at miranda.oneill@nau.edu.