



**National Tribal**  
AIR ASSOCIATION

August 28, 2025

Secretary Chris Wright  
Department of Energy  
1000 Independence Avenue SW  
Washington, DC 20585

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

Dear Secretary Wright,

The National Tribal Air Association (NTAA) submits this letter regarding the Department of Energy's Report: A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate.

The NTAA is a member-based organization with 161 Member Tribes. The organization's mission is to advance air quality management policies and programs, consistent with the needs, interests, and unique legal status of American Indian Tribes and Alaskan Natives. As such, the NTAA uses its resources to support the efforts of all federally recognized Tribes in protecting and improving the air quality within their respective jurisdictions. Although the organization always seeks to represent consensus perspectives on any given issue, it is important to note that the views expressed by the NTAA may not be agreed upon by all Tribes. Further, it is also important to understand that interactions with the organization do not substitute for Nation-to-Nation consultation, which can only be achieved through direct communications between the federal government and American Indian Tribal Governments and Alaskan Natives.

The NTAA is disappointed in the lack of scientific rigor demonstrated in this Report. The Report does not provide a comprehensive review of existing climate science but instead is a "cherry picked" summary of information. The Report often provides a misinterpretation of the underlying reports<sup>1</sup> cited to call into question the existing body of peer-reviewed climate science. The authors acknowledge the limited scope of the study, stating:

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<sup>1</sup> <https://www.science.org/content/article/contrarian-climate-assessment-u-s-government-draws-swift-pushback>.

The short timeline and the technical nature of the material meant that we could not comprehensively review all topics. Rather, we chose to focus on topics that are treated by a serious, established academic literature; that are relevant to our charge; that are downplayed in, or absent from, recent assessment reports; and that are within our competence.<sup>2</sup>

Since this report is being used to justify the rescission of the 2009 Endangerment Finding -- a finding built on a comprehensive review of the available climate literature at the time -- and because a significant body of established academic literature on climate change has developed in the subsequent 16 years, this lack of comprehensive review of the science is inappropriate.

The NTAA is concerned about the many issues represented in the report that are limited in scope to the point where they exclude discussions of the true cost to public health and welfare. For example, the Report discusses the value of elevated concentrations of CO<sub>2</sub> but the information presented in the report is limited in scope to only look at the “fertilizer” effect of added carbon dioxide, that added CO<sub>2</sub> directly enhances plant growth, globally contributing to “greening” the planet and increasing agricultural productivity. It does not discuss the adverse impacts of increased CO<sub>2</sub> from, for example, wildfires, extreme weather events, and drought.

In many places, the Report presents only one aspect of a complicated scientific issue but does not address contrary evidence, nor accurately characterize the science discussed. In addition, the Report excludes climate change impacts that are important to Indian Tribes and Alaskan Natives.

For example, the discussion of sea-level rise looks at local variability but neglects to discuss the impacts on coastal communities. There are many Alaskan Native Villages where the costly effects of sea-level rise and accompanying erosion, either in the form of home losses, erosion mitigation, and relocation, are not discussed at all in this Report.

In addition, the Report misrepresents the work of Joy Ward, an evolutionary biologist<sup>3</sup> whose work was conducted to create a “mechanistic understanding” of CO<sub>2</sub> on vegetation in a controlled setting, and not representative of ecosystem-level impacts such as the impact on vegetation and crops due to increased heat, drought, and flooding that result from climate change.<sup>4</sup> Ward’s work was not designed to address the impact of how the effects of a changing climate can cause shifts in the ecosystem. Ecosystem shifts are particularly important to Tribal communities who are tied to reservations or Treaty-protected areas, where migration of

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<sup>2</sup> [https://www.energy.gov/sites/default/files/2025-07/DOE\\_Critical\\_Review\\_of\\_Impacts\\_of\\_GHG\\_Emissions\\_on\\_the\\_US\\_Climate\\_July\\_2025.pdf](https://www.energy.gov/sites/default/files/2025-07/DOE_Critical_Review_of_Impacts_of_GHG_Emissions_on_the_US_Climate_July_2025.pdf)

<sup>3</sup> <https://www.wired.com/story/scientists-say-new-government-climate-report-twists-their-work/>

<sup>4</sup> *Id.*

subsistence resources, both plants and animals, causes them to move away from traditional gathering areas. These moves can significantly impact cultural practices and Treaty-protected activities on and off-reservation hunting and gathering. The Report does not address these issues.

Similarly, the Report looks at climate change impact on oceans, by only discussing of acidification and its impact on coral bleaching and further limits the discussion to one ocean ecosystem and the rebound of the Great Barrier Reef. There was no discussion of other areas of coral bleaching and no discussion of the effect of increased temperatures on other aquatic ecosystems. In addition, the Report does not consider the impact of acidification on traditional Tribal resources such as impacts on clams and other important subsistence food for coastal Tribes. Additionally, The Report cited work by Jeff Clements, a marine biologist, which stated that acidification from increased CO<sub>2</sub> emissions had less impact on fish species than expected, but does not address the impact on decalcification of other species of mollusks (clams, oysters and others).<sup>5</sup> Indeed, other work from Clements' lab has examined how [heat waves negatively alter clam behavior](#).<sup>6</sup> The Report's limited discussion of ocean acidification does not take into account the impact of that decalcification nor the effect on mollusk populations on coastal Tribes and their reliance of Traditional aquatic resources.

The NTAA is concerned about the representation of the modeling used to predict emissions trends and concentrations. The NTAA is concerned that the report misrepresents the underlying studies. For example, as noted in the article in Science.org:

Zeke Hausfather, a climate scientist at Stripe, noted in a Bluesky post that the report cited his influential study in 2020 showing the most extreme climate scenario sometimes used by modelers, based on emissions rising for many decades to come, no longer represents reality because emissions are close to plateauing. But the report said that finding undermined EPA's projections of warming. "Their point is completely backwards," Hausfather wrote, noting that Earth would still warm with lower emission scenarios. "My paper actually supports the EPA's 2009 range of 1.8C to 4C warming by 2100."<sup>7</sup>

Although this is not specifically a Tribal issue, it does demonstrate the lack of scientific rigour used in developing the Report.

The NTAA also disagrees with the assertion "that most extreme weather events in the U.S. do not show long-term trends of increasingly frequent extreme events. Claims that increased

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<sup>5</sup> <https://www.wired.com/story/scientists-say-new-government-climate-report-twists-their-work/>

<sup>6</sup> *Id.*

<sup>7</sup> <https://www.science.org/content/article/contrarian-climate-assessment-u-s-government-draws-swift-pushback>.

frequency or intensity of hurricanes, tornados, floods and droughts are consistent with historic trends, is not supported by the available U.S. data.” On the contrary, the increase frequency and intensity of flood events, hurricanes, wildfires, droughts, melting of permafrost and other impacts are more than evident effects of climate. All of these have had impacts in Indian country, from flooding from Helene in the North Carolina mountains, to desertification and draught in the southwest, wildfires in the west and melting permafrost and erosion impacts in Alaskan Native Villages.

Although the NTAA agrees that forest management practices play a role in the increase in number and intensity of wildfires, NTAA believes the evidence of increased frequency of drought and higher temperatures due to climate change also plays an important role. These are discounted in the draft report.

The NTAA also requests that the Report be updated to include a review of the cost of wildfires to public health and the environment. The impact of wildfires experienced by Tribes both directly from fire, as well as the impact of wildland smoke of public health, is particularly important in Tribal communities given that Tribes have higher rates of asthma, respiratory disease and heart conditions.

The NTAA disagrees with the Report’s statement that CO<sub>2</sub>-induced warming might be less damaging economically than commonly believed, and excessively aggressive mitigation policies could prove more detrimental than beneficial. This argument is not supported by the body of scientific evidence and experience of people of the United States, particularly low-income communities and Tribal and Alaskan Native communities who experience higher rates of health impacts and who have fewer resources to recover from extreme weather events.

Finally, the NTAA disagrees with the Report’s assertion that U.S. policy actions are expected to have undetectably small direct impacts on the global climate, and any effects will emerge only with long delays. This misstates the disproportionate size of U.S. emissions compared to the U.S. population and ignores the important influence of U.S. policy on global environmental policy. The U.S. has been a leader in environmental protection since the formation of the Clean Air Act and the Environmental Protection Agency in 1970. The Administration’s proposed retreat from protecting public health and welfare is a retreat from the recognition of the body of evidence showing the impacts of climate change and the need for more regulations and other action. It is also a retreat from the leadership this country has played in environmental protection and in encouraging other countries to do more to address climate change.

In closing, the NTAA requests that the DOE conduct a more comprehensive review of the science that fully recognizes the full range of impacts of climate change on public health and the environment. The NTAA requests that this analysis be more inclusive of experts in the development of the report and that the DOE take the time necessary to present a balanced view

of the body of science. Finally, the NTAA requests that DOE revise the Report to fully evaluate the impacts to Native Nations and Tribal communities from climate change. Because this report is the justification of the rescission of the 2009 Endangerment Finding, and because of the disproportionate impacts of climate change on Tribes, NTAA encourages DOE to offer Consultation to Tribes on the report and it's finding to better understand the impacts of climate change in Indian country.

Respectfully

Syndi Smallwood  
Chair  
National Tribal Air Association

Cc: Mr. Joshua Loucks, DOE, General Council  
Lee Zeldin, Administrator US EPA  
Aaron Szabo, Assistant Administrator Nominee  
Peter Tsirigotis, Director, OAQPS  
Sarah Dunham, Director of the Office of Transportation and Air Quality, performing delegated duties as the Assistant Administrator for the Office of Air and Radiation  
Abigale Tardif, Principal Deputy Assistant Administrator  
Elizabeth Shaw, Deputy Assistant Administrator  
Alexander Dominguez, Deputy Assistant Administrator for OAR leading Mobile Sources  
Tabitha Langston, National Tribal Caucus Chair  
Sharri Venno, R1 RTOC Tribal Co-Chair  
Shavonne Smith, R2 RTOC Tribal Co-Chair  
Dana Adkins, R3 RTOC Tribal Co-Chair  
Jerry Cain, R4 RTOC Tribal Co-Chair  
Brandy Toft, R5 RTOC Tribal Co-Chair  
Sage Mountainflower, R6 RTOC Tribal Co-Chair  
Alisha Bartling, R7 RTOC Tribal Co-Chair  
Jason Walker, Chairman Northwestern Band of Shoshone Nation and R8 RTOC Tribal Co-Chair  
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