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Re: Docket ID No. EPA–HQ– OAR–2009–0171

Comments related to EPA's April 24, 2009 **Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act (EF) are being filed in separate documents**.

These comments also address issues in the April 17, 2009 **Technical Support Document (TSD)** that includes many of the detailed references to science, data, and models used to justify comments in the Endangerment Finding.

EPA's responsibility under the Federal Information Quality Act (IQA) is to review the original source documentation and data to make an independent judgment about the science, the data and the models. EPA also had the obligation to review the comments filed in 2008 on both the CCSP and ANPR and to reflect revisions as requested under the Petitions for Correction filed on those documents. As is shown below, the Administrator (and the EPA staff) relied on a superficial and erroneous review of summaries and conclusions of other "studies" rather than conducting a thorough evaluation of the relevant science, data and model analysis. One obvious problem was the use of EPA and government "reviewers" who are anything but independent reviewers. There is an inherent conflict of interest in the process used by EPA. This is a pervasive fatal flaw in the Endangerment Finding and the Technical Support Document. EPA's reliance on "studies" that fail to meet the requirements of the IQA invalidates the Endangerment Finding.

The data disseminated fails to comply with the basic objectivity, utility and integrity guidelines of the IQA. "Objectivity" is a measure of whether disseminated information is accurate, reliable, and unbiased and whether that information is presented in an accurate, clear, complete, and unbiased manner; ''utility'' refers to the usefulness of the information to the intended users; ''integrity'' refers to the security of information—protection of the information from unauthorized access or revision, to ensure that the information is not compromised through corruption or falsification.

Detailed comments were filed separately on the following issues:

Model Failures, Natural Variability
Urban Heat Islands
Data Integrity
Northeast Regional Impacts
Northwest Regional impacts
Heat Waves
Sea Level Rise
Arctic
Greenland

Issue Summaries

Model Failures, Natural Variability:

First of all the observed changes over the last century can be easily explained by urban and local contamination that exaggerated the warming and multidecadal cycles in the oceans and on the sun. CO2 correlates poorly with the temperatures except during brief intervals in the 1920s to 1940s and 1979 to 1998.

The models, regardless of scenarios used are failing. They can not thus be used to say it "is very likely the warming is very likely to be greater than observed warming over the past century."

Other natural factors, discounted by the IPCC and CCSP and thus the EPA can be shown to explain observed changes and thus are better guides as to future climates than the failed models. These other factors, despite coverage in the IPPC, were discounted in the Summary for Policymakers and the entire CCSP report except to acknowledge short term variability due to ENSO. This is true despite considerable peer review support for their importance to climate and correlation with observed climate changes.

See CORE of filing here.

Urban Heat Islands:

(1) The EPA relied on IPCC and CCSP assessments that **cherry picked the starting year of the trend period to show warming not present in longer term trends**. 1970 is a relative minimum in the cyclical changes over the last century and 2000 a relative maximum.

(2) The United States and Global Data Bases are Seriously Contaminated by urbanization for which **NO ADJUSTMENTS** are made. There is significant peer review research that supports the need to adjust for urban and local factors that was available before deadlines for the IPCC and CCSP and even more for the EPA review of the science in the IPCC and CCSP**. The EPA incorrectly states that urban heat island is already adjusted for in the data processing**. This is a fatal flaw in the trend analysis that renders the conclusions made invalid.

See Core of filing here.

Data Integrity:

The United States and especially the global databases have serious problems that render them highly useless for determining accurate long-term temperature trends. Most of the issues mentioned below produce a warm bias in the data. The data disseminated fails to comply with the basic objectivity, utility and integrity guidelines of the Federal Information Quality Act ("objectivity" is a measure of whether disseminated information is accurate, reliable, and unbiased and whether that information is presented in an accurate, clear, complete, and unbiased manner; ''utility'' refers to the usefulness of the information to the intended users; ''integrity'' refers to the security of information—protection of the information from unauthorized access or revision, to ensure that the information is not compromised through corruption or falsification).

There has clearly been some cyclical warming in recent decades (most notably 1979 to 1998) confirmed by satellites, but longer term trends are much more uncertain. The global surface station based data is seriously compromised by urbanization and other local factors (land-use /land-cover, improper siting, station dropout, instrument changes unaccounted for and missing data) and thus the databases overestimate the warming. Numerous peer-reviewed papers available to the authors of both the IPCC and CCSP but ignored in favor of cherry-picked papers by authors employed by the data centers themselves, in the last several years have shown this overestimation are the order of 30 to 50% from these issues alone. Divergence of satellite versus land/ocean databases in recent years also provides evidence of this data integrity problem.

The cessation of warming in the late 1990s and an increasing cooling trend since 2002 in the atmosphere and at least 2003 in the oceans call into question the entire premise of the 'greenhouse gas' driven global warming.

See CORE of filing here.

Northeast Regional Impacts:

Temperature trends in the past were based on a cherry-picked time period that started at the coldest period and ended during a cyclical peak. The same NOAA NCDC data will be shown which shows clearly the 60-70 year cyclical behavior of the temperatures in tune with cyclical behavior in both oceans. An examination between successive relative maxima and successive relative minima show little net changes over the last century in winter temperatures.

Future projections of temperatures are based on models which even lead authors of the IPCC admit GCMs can't be used to predict regional climate changes.

Other projections about snowfall and drought and hurricanes will be shown to relate to the same ocean based multidecadal behavior.

See CORE of filing here.

Northwest Regional impacts:

The TSD's statement that all United States regions will warm greater than the global average is based solely on GCM models which even IPCC lead author Kevin Trenberth (2007) has admitted doesn't represent the current state of the climate in any way and can't be used for regional assessment until they are properly initialized.

The CCSP support document cherry picks the starting and ending times for trends in temperatures and snow water equivalent in order to find warming and diminished snowpack. If you look at longer term periods, you find no trends. The shorter trends relate to cyclical patterns in the Pacific, strongly supported by peer review literature.

See CORE of filing here.

Heat Waves:

There is no indication that record heat is increasing in frequency, in fact the data shows a precipitous decline in the number of heat records in recent decades. The early 20th century dominates the heat statistics for the United States and the world.

The forecasts are based on GCMs that have failed to catch the cooling this past decade and that even the IPCC Lead Author modelers like Kevin Trenberth agree can't be relied for regional prediction.

See CORE of filing here.

Sea Level Rise:

This is an incorrect statement. There are numerous recent peer review papers and a satellite data set that finds this is not true and in fact that the sea level rises have slowed in recent decades, most dramatically in the past few years as the oceans have cooled and contracted. Many of these peer reviewed papers were available by the deadlines for IPCC and CCSP review and all in time for the EPA reviewers to consider in their findings. These papers were ignored in deference to GCM forecasts, which are failing.

See CORE of filing here.

Arctic:

The described changes in the Arctic are not at all unprecedented nor are they as described. Many peer review papers support interaction with the Atlantic and Pacific and other factors not greenhouse warming are the real drivers.

Changes to temperature and ice happen predictably every 60 years or so and is in fact entirely natural, related to multidecadal ocean cycles and possibly recently accentuated by major undersea volcanism and the invasion of tundra shrubs and deposition of soot from Asia.

Records of arctic ice cover extent start in 1979. Multidecadal cyclical warming was observed before in the 1800s and middle 1900s long before the industrial revolution. Also there is more recent evidence showing the idea of lubrication by melt water accelerating loss of glacial or icecap ice is not valid.

See CORE of filing here.

Greenland:

The described changes in Greenland are not at all unprecedented nor are they as described. Many peer review papers support interaction with the Atlantic multidecadal cycles and other factors not greenhouse warming are the real drivers.

Changes to temperature and ice happen predictably every 60 years or so and is in fact entirely natural, related to multidecadal ocean cycles especially in the Atlantic

Multidecadal cyclical warming in Greenland was observed before in the 1800s and middle 1900s long before the industrial revolution. Also there is more recent evidence showing the idea of lubrication by melt water accelerating loss of glacial or icecap ice is not valid.

See CORE of filing here.