November 14, 2008

Air and Radiation Docket and Information Center
Environmental Protection Agency
Mailcode: 2822T
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Office of Information and Regulatory Affairs
Office of Management and Budget
Attn: Desk Officer for EPA
725 17th Street, NW.
Washington, D.C. 20503

To Whom It May Concern:

On behalf of the American Association for the Advancement of Science (AAAS), I would like to thank you for the opportunity to comment on the Advance Notice of Proposed Rulemaking (ANPR) for Regulating Greenhouse Gas Emissions Under the Clean Air Act published in the Federal Register on July 30 (Docket ID No. EPA–HQ–OAR–2008–0318). In particular, AAAS seeks to offer requested comments on “the best available science for purposes of the endangerment discussion.”

The AAAS Board of Directors approved a statement on climate change in December 2006 (attached) based largely on the Third Assessment Report of the Intergovernmental Panel on Climate Change (IPCC) and the 2005 Joint National Academies’ statement. The statement, in part, recognizes:

“The scientific evidence is clear: global climate change caused by human activities is occurring now, and it is a growing threat to society. Accumulating data from across the globe reveal a wide array of effects: rapidly melting glaciers, destabilization of major ice sheets, increases in extreme weather, rising sea level, shifts in species ranges, and more.”

Since the statement was released, the IPCC Fourth Assessment Report has been released, finding greater observed and projected climate change impacts, many of which are cited in the ANPR. These are also consistent with the AAAS statement:

“As expected, intensification of droughts, heat waves, floods, wildfires, and severe storms is occurring, with a mounting toll on vulnerable ecosystems and societies. These events are early warning signs of even more devastating damage to come, some of which will be irreversible.”
These and other impacts identified in the ANPR reflect the current state of the science, as articulated in the consensus documents of the IPCC. This science shows clear impacts to society that are occurring now and will continue to grow.

We hope that the Environmental Protection Agency continues to rely upon this sound scientific basis as it moves forward on decisions related to climate policy.

AAAS stands ready to assist in efforts to address this important issue.

Sincerely,

Alan I. Leshner