



COMPETITIVE ENTERPRISE INSTITUTE

19 February 2003

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**Re: Request for Correction of Information: Petition to Cease Dissemination of the
National Assessment on Climate Change, Pursuant to the Federal Data Quality Act**

Introduction

This document follows and incorporates by reference: Comments provided 3 June 2002 by CEI to the Department of Commerce as it and NOAA developed Guidelines under the Federal Data Quality Act (FDQA), correspondence sent to Assistant Secretary Dr. James R. Mahoney and Under Secretary Vice Admiral Conrad C. Lautenbacher, Jr (18 October 2002) requesting that the US Global Change Research Change Project's National Assessment Synthesis Team undergo housecleaning to remove members responsible for the unlawfully produced, incomplete and FDQA-noncompliant National Assessment on Climate Change, and CEI's Comments on NOAA/USCCSP's "Strategic Plan for the Climate Science Program" (17 January 2003)(all attached).

Pursuant to the justification presented therein and incorporated by reference in this Request, the Competitive Enterprise Institute requests correction of information, under Section 515 of Public Law 106-554, seeking Commerce/NOAA comply with the FDQA by immediately ceasing dissemination of the "*Synthesis Product*" formally if inaccurately styled as meeting the requirements as a first statutorily required "Climate Change Impacts in the United States: The Potential Consequences of Climate Variability and Change", or National Assessment (NACC).

As the lead plaintiff in *CEI, Inhofe, et al. v. Clinton* (DC DC CV 00-02383), litigation based on that product's unlawful production, CEI is an Affected Person. Further, CEI is an active participant in the domestic debate over United States "climate change" policies addressing regulatory and related policies of the United States government and their impact on its citizens, including *inter alia* an active practice writing and publishing (research, opinion, books, monographs, and biweekly "Cooler Heads" newsletter), advocating and as warranted litigating on policies regarding the economics, science and policies surrounding the theory of catastrophic anthropogenic global warming ("climate change"), which is the subject of the Synthesized Product at issue in the Request. Our numerous documents previously filed on related matters and attached also demonstrate CEI's status as an Affected Person.

Summary

Consistent with and following upon CEI's 3 June 2002 "Comments on Commerce's Proposed Data Quality Guidelines", we request "correction" of NACC's fatal data flaws which, which upon review appears to be only obtainable by ceasing dissemination of the entirety.

The following represents "an accurate citation to or description of the particular information disseminated which is the subject of the request, including: the date, point and form of disseminations and source from which the requester obtained the information" – NACC was originally disseminated electronically and in print December 2000, continuing to present, at <http://www.usgcrp.gov/usgcrp/nacc/default.htm>. That the entirety of the relevant USGCRP is now effectively located in and out of NOAA's Global and Climate Change Program (see, e.g., "Program Guide to Federally Funded Environment and Natural Resources R&D", available through <http://www.nnic.noaa.gov/CENR/>, CENR itself being housed out of NOAA as that and other documents and web addresses attest) satisfies the inquiry into the "indication of which NOAA office or program disseminated the information; and any other details that will assist NOAA in identifying the specific information which is the subject of the request and locating the responsible office".

As CEI detailed in its Comments on Commerce's Proposed FDQA Guidelines, the White House Office of Management and Budget's (OMB) Interim Final Guidelines for agency compliance with FDQA requirements (66 FR 49718), finalized by OMB's January 3, 2002 Final Guidance (67 FR 369), were expressly "government-wide" (see FDQA Section 515(b)(1)). We continue our proceeding under Commerce's now-final Guidelines, and particularly NOAA's "*Information Quality Guidelines*", to the extent these Guidelines further and are not in conflict with OMB's organic government-wide guidelines and/or FDQA.

As also detailed in the attached, FDQA prohibits – and therefore, Commerce/NOAA must cease -- dissemination of NACC as the sole feasible "correction" given the errors' endemic nature due to that document's rampant violations of the data quality requirements of "**objectivity**" (whether the disseminated information is presented in an *accurate, clear, complete* and *unbiased* manner and is as a matter of substance *accurate, reliable* and *unbiased*), and "**utility**" (the *usefulness* of

the information to the *intended users* (per the US Global Change Act of 1990, these are Congress and the Executive Branch).

This invokes NACC's inappropriate use of and reliance upon computer models and data that upon scrutiny are demonstrably meaningless. Further, in developing the published version of NACC, the US Global Change Research Program (USGCRP) also admittedly failed to perform the necessary science underlying regional and sectoral analyses (that Congress contemporaneously notified USGCRP was a condition precedent to the release of even a draft National Assessment, as the absence of such yields the absence of sound science). FDQA ratifies those objections, and is violated by continued dissemination of this product by any federal agency.

An extensive record obtained through the Freedom of Information Act (FOIA) provides additional evidence requiring a prohibition on further NACC dissemination. This record exposes that the purported internal "peer review" of the draft NACC did not in fact occur, and also ratifies the inappropriate use of computer models, detailed herein. As the obtained documents demonstrate, commenting parties expressly informed USGCRP that they were rushed and given wildly inadequate time for substantive review or comment. USGCRP published and continues to disseminate the product nonetheless, as do all agencies such as Commerce/NOAA which reference, cite, link or otherwise disseminate NACC.

All of these failings ensure that dissemination of NACC violates FDQA's requirement, manifested in OMB's Guidelines and as necessarily manifested by Commerce's and NOAA's final guidelines, that data disseminated by Federal Agencies meet standards of quality as measured by specific tests for objectivity, utility and integrity.

As the statutorily designated steering document for policymaking – despite that the particular document at issue admittedly failed to complete the statutory mission required to qualify as a "National Assessment," and was disavowed by the White House Office of Science and Technology Policy in order to resolve litigation also brought by, *inter alia*, CEI -- NACC qualifies as "influential scientific or statistical information" for purposes of FDQA. Therefore it must meet a "reproducibility" standard, setting forth transparency regarding data and methods of analysis, "as a quality standard above and beyond some peer review quality standards."

Pursuant to these prior filings, CEI requests that Commerce/NOAA immediately comply with FDQA and cease dissemination of the National Assessment on Climate Change in whole or part and in any form including any product relying on NACC. We therefore also request that you notify us at your earliest convenience of Commerce/NOAA's substantive response to the violations set forth in this series of communications and the docket number assigned.

Facts

I. FDQA Coverage of the NACC

However and by whatever cooperative effort of several government agencies, NACC as originally produced and/or disseminated is inescapably covered by FDQA when disseminated by a Federal Agency. This is particularly true given that no permissible interpretation of FDQA would permit evasion of its requirements, particularly regarding such a massive taxpayer expenditure, on the basis that it was a collaborative effort of numerous covered agencies. It is noteworthy that, whatever the status of the governmental cooperative producing NACC, as directed by the Executive Office of the President (EOP), the United States Global Change Research Program (USGCRP), as putative producer of the National Assessment on Climate Change nonetheless is subject to the Federal Data Quality Act (FDQA). FDQA covers the same entities – and therefore, products -- as the Paperwork Reduction Act (PWRA)(44 U.S.C. Sections 3501 *et seq.*; see esp. 44 U.S.C. 3502(1)).

By statute the President serves as Chairman of the National Science and Technology Council (“NSTC”), operating under the White House Office of Science and Technology Policy (“OSTP”), and which has under its authority the Committee on Environment and Natural Resources (“CENR”) (15 U.S.C. 2932 (originally “Committee on Earth and Environmental Sciences”)). All of these offices are therefore EOP entities, subject to PWRA, thus FDQA.

Per 15 U.S.C. 2934 the President, as Chairman of the Council, shall develop and implement through CENR a US Global Change Research Program. The Program shall advise the President and Congress, through the NACC, on relevant considerations for climate policy. Though the composite USGCRP is an “interagency” effort staffed in great part by seconded employees from federal agencies, it remains under the direction of the President and is therefore a “covered agency” pursuant to 44 U.S.C. 3502(1).

Collectively and pursuant to statutory authority, under the direction of these Executive offices the collaborative effort USGCRP directed an effort statutorily dedicated in part to studying the state of the science and its uncertainties surrounding the theory of “global warming” or “climate change,” producing a National Assessment on Climate Change. Though originally produced prior to FDQA, the data asserted by the NACC (issued in final in December 2000), current or continued dissemination is subject to the requirements of the Federal Data Quality Act. Such an argument of “pre-existing study” is not available as regards any disseminated document under FDQA.

Critically NOAA, through its Climate Change Science Program has assumed “Integrated Management of the USGCRP and (Climate Change Research Initiative)”(see “Testimony of James R. Mahoney, Ph.D. Assistant Secretary of Commerce for Oceans and Atmosphere Before the United States Senate Committee on Commerce, Science and Transportation Hearing on Climate Change – Greenhouse Gas Reductions and Trading System”, 8 January 2003 found at <http://www.climate.science.gov/Library/testimony8jan2003-mahoney.htm>). As such NOAA

inescapably bears responsibility for this dissemination pursuant to FDQA. See also, *e.g.*, “NOAA’s Office of Global Programs Coordinates Climate and Global Change Research”, found at <http://www.usgcrp.gov/usgcrp/Library/nationalassessment/newsletter/1999.02/NOAGlob.html>. Also relevant is that NOAA through the Under Secretary of Commerce continuously serves as a rotating Chair/Vice Chair of the Interagency Climate Change Science Program, or Interagency Working Group on Climate Change Science and Technology, see *e.g.*, <http://www.climatescience.gov/images/ccst-orgchart.jpg>, which “has assumed oversight of both programs, with a single interagency committee responsible for the entire range of science projects sponsored by both programs. The Interagency Climate Change Science Program retains the responsibility for compliance with the requirements of the [Global Change Research Act of 1990](#), including its provisions for annual reporting of findings and short-term plans, scientific reviews by the National Academy of Sciences/National Research Council, and periodic publication of a ten-year strategic plan for the program,” and also thus retains responsibility for relevant statutory compliance (see <http://www.climatescience.gov/about/default.htm>)(and “Environmental Data and Information Services, at <http://www.noaa.gov/str-plan/envd3.htm>).

II. Development of NACC

The Assessment was produced as follows:

1. Pursuant to and/or under the auspices of the Global Change Research Act of 1990, 15 U.S.C. 2921, *et seq.*, USGCRP is assigned the responsibility of producing a scientific assessment, particularly that which is at issue in this Petition, as follows:

“On a periodic basis (not less frequently than every 4 years), the Council, through the Committee, shall prepare and submit to the President and the Congress an assessment which –

- (1) integrates, evaluates, and interprets the findings of the [USGCR] Program and discusses the scientific uncertainties associated with such findings;
 - (2) analyzes the effects of global change on the natural environment, agriculture, energy production and use, land and water resources, transportation, human health and welfare, human social systems, and biological diversity; and
 - (3) analyzes current trends in global change both human-induced (sic) and natural, and projects major trends for the subsequent 25 to 100 years.” (15 U.S.C. 2934).
2. The document at issue in this Petition, the “First National Assessment on Climate Change,” disseminates data rising to the requisite FDQA levels of “quality”, as described herein.
 3. USGCRP’s surge to release a flawed, partial, and partially unauthorized report came despite requests of lawmakers and outside interests concerned with the issues at hand to

withhold releasing any such document lacking particular required scientific foundations, in violation of several laws and public policy.

III. The Assessment violates the requirements of the FDQA in the following ways:

1. NACC Relies Upon and Promotes Improper Use of Computer Model Data

For the following reasons, NACC violates FDQA’s “objectivity” and “utility” requirements. For these same reasons, as “influential scientific or statistical information”, NACC also fails FDQA’s “reproducibility” standard, establishing transparency requirements for data and methods of analysis, “a quality standard above and beyond some peer review quality standards.”

First, consider excerpts from the review of NACC by Patrick Michaels, Professor of Environmental Sciences at University of Virginia, dated and submitted to USGCRP August 11, 2000, detailing the above-noted concerns placing the NACC in violation of FDQA. Where appropriate, additional *explanatory text* is included. **USGCRP made no apparent alterations of the original text in response to these comments, therefore the comments apply to NACC as disseminated.**

“August 11, 2000...

“The essential problem with the USNA [*elsewhere cited in this Petition as the NACC*] is that it is based largely on two climate models, neither one of which, when compared with the 10-year smoothed behavior of the lower 48 states (a very lenient comparison), reduces the residual variance below the raw variance of the data. The one that generates the most lurid warming scenarios—the Canadian Climate Centre (CCC) Model—produces much larger errors than are inherent in the natural noise of the data. That is a simple test of whether or not a model is valid...and both of those models fail. All implied effects, including the large temperature rise, are therefore based upon a multiple scientific failure. The USNA’s continued use of those models and that approach is a willful choice to disregard the most fundamental of scientific rules. (And that they did not find and eliminate such an egregious error is testimony to grave bias). For that reason alone, the USNA should be withdrawn from the public sphere until it becomes scientifically based.”

Explanatory text: *The basic rule of science is that hypotheses must be verified by observed data before they can be regarded as facts. Science that does not do this is “junk science”, and at minimum is precisely what the FDQA is designed to bar from the policymaking process.*

The two climate models used in the NACC make predictions of U.S. climate change based upon human alterations of the atmosphere. Those alterations have been going on for well over 100 years. Do the changes those models “predicted” for U.S. climate in the last century resemble what actually occurred?

This can be determined by comparison of observed U.S. annual temperature departures from the 20th century average with those generated by both of these models. It is traditional to use moving averages of the data to smooth out year-to-year changes that cannot be anticipated by any climate model. This review used 10-year running averages to minimize interannual noise.

The predicted-minus-observed values for both models versus were then compared to the result that would obtain if one simply predicted the average temperature for the 20th century from year to year. In fact, both models did worse than that base case. Statistically speaking, that means that both models perform worse for the last 100 years than a table of random numbers applied to ten-year running mean U.S. temperatures.

There was no discernible alteration of the NACC text in response to this fatal flaw. However, the NACC Synthesis Team, co-chaired by Thomas Karl, Director of the National Climatic Data Center, took the result so seriously that they commissioned an independent replication of this test, only more inclusive, using 1-year, 5-year, 10-year and 25-year running means of the U.S. annual temperature. This analysis verified that in fact both models performed no better than a table of random numbers applied to the U.S. Climate Data. Mr. Karl was kind enough to send the results to this reviewer.

“...the problem of model selection. As shown in Figure 9.3 of the Third Assessment of the United Nations Intergovernmental Panel on Climate Change, the behavior of virtually every General Circulation Climate model (GCM) is the production of a linear warming, despite assumptions of exponential increases in greenhouse forcing. In fact, only one (out of, by my count, 26) GCMs produces a substantially exponential warming—the CCC model [one of the two used in the NACC]. Others may bend up a little, though not substantially, in the policy-relevant time frame. The USNA specifically chose the outlier with regard to the mathematical form of the output. No graduate student would be allowed to submit a thesis to his or her committee with such arrogant bias, and no national committee should be allowed to submit such a report to the American people.

Even worse, the CCC and Hadley data were decadal smoothed and then (!) subject to a parabolic fit, as the caption for the USNA’s Figure 6 makes clear. That makes the CCC even appear warmer because of the very high last decadal average.

One of the two models chosen for use in the USNA, the Canadian Climate Center (CCC) model, predicts the most extreme temperature and precipitation changes of all the models considered for inclusion. The CCC model forecasts the average temperature in the United States to rise 8.1°F (4.5°C) by the year 2100, more than twice the rise of 3.6°F (2.0°C) forecast by the U.K. model (the second model used in the USNA). Compare this with what has actually occurred during the past century. The CCC model predicted a warming of 2.7°F (1.5°C) in the United States over the course of the twentieth century, but the observations show that the increase was about 0.25°F (0.14°C) (Hansen, J.E., et al., 1999: GISS analysis of surface temperature change. *Journal of Geophysical Research*, **104**, 30,997–31,022), or about 10 times less than the forecast [Hansen has since revised this to 0.5°C, which makes the prediction three times greater than what has been observed].... The CCC forecast of precipitation changes across the United States is equally extreme. Of all the models reviewed for inclusion in the USNA, the CCC model predicted more than twice the precipitation

change than the second most extreme model, which interestingly, was the U.K. model [the other model used in the NACC]. The U.K. model itself forecast twice the change of the average of the remaining, unselected models. Therefore, along with the fact that GCMs in general cannot accurately forecast climate change at regional levels, the GCMs selected as the basis for the USNA conclusions do not even fairly represent the collection of available climate models.

Why deliberately select such an inappropriate model as the CCC? [Thomas Karl, co-Chair of the NACC synthesis team replied that] the reason the USNA chose the CCC model is that it provides diurnal temperatures; this is a remarkable criterion given its base performance....”

“The USNA’s high-end scenarios are driven by a model that 1) doesn’t work over the United States; 2) is at functional variance with virtually every other climate model. It is simply impossible to reconcile this skewed choice with the rather esoteric desire to include diurnal temperatures...”

Explanatory text: *It is clear that the NACC chose two extreme models out of a field of literally dozens that were available. This violates the FDQA requirements for “objectivity” detailed in the third paragraph of this Petition.*

Second, Dr. Michaels is clearly not alone in his assessment. The following are excerpts from comments by government reviewers, received and possessed by USGCRP, or USGCRP’s “peer reviewers” failed attempts to elevate the NACC to the level of scientific product. For example, consider that styled “**Improper use of climate models**”, by William T. Pennell of Northwest National Laboratory, submitted through DOE (John Houghton) to Melissa Taylor at USGCRP:

“Although it is mentioned in several places, greater emphasis needs to be placed on the limitations that the climate change scenarios used in this assessment have on its results. First, except for some unidentified exceptions, only two models are used. Second, nearly every impact of importance is driven by what is liable to happen to the climate on the regional to local scale, but it is well known that current global-scale models have limited ability to simulate climate effects at this degree of spatial resolution. We have to use them, but I think we need to be candid about their limitations. Let’s take the West [cites example]...Every time we show maps that indicate detail beyond the resolution of the models we are misleading the reader.”

USGCRP received other comments by governmental “peer reviewers” affirming these clear, significant, indeed disqualifying modeling data transgressions:

“Also, the reliance on predictions from only two climate models is dangerous”. Steven J. Ghan, Staff Scientist, Atmospheric Sciences and Global Change, Pacific Northwest Laboratory.

“This report relies too much on the projections from only two climate models. Projections from other models should also be used in the assessment to more broadly

sample the range of predicted responses.” Steven J. Ghan Staff Scientist, Atmospheric Sciences and Global Change, Pacific Northwest Laboratory.

“Comments on National Assessment. 1. The most critical shortcomings of the assessment are the attempt to extrapolate global-scale projections down to regional and sub-regional scales and to use two models which provide divergent projections for key climatic elements.” Mitchell Baer, US Department of Energy, Washington, DC.

“General comments: Bias of individual authors is evident. Climate variability not addressed... Why were the Hadley and Canadian GCMs used? Unanswered questions. Are these GCM’s [sic] sufficiently accurate to make regional projections? Nope”. Reviewer Stan Wullschleger (12/17/99).

William T. Pennell, Manager, Atmospheric Sciences and Global Change, Pacific Northwest Laboratory, cites the that “only two models are used” as a “limitation” on the product.

The final NACC currently disseminated by Commerce/NOAA shows these admonitions went unheeded.

Stated simply, the climate models upon which NACC relies struck out. Strike one: they can't simulate the current climate. Strike two: they falsely predict greater and more rapid warming in the atmosphere than at the surface -- the opposite is happening (see *e.g.*, http://www.ghcc.msfc.nasa.gov/MSU/hl_sat_accuracy.html). Strike three: they predict amplified warming at the poles, which are cooling instead (see *e.g.*, <http://www.washingtonpost.com/wp-dyn/articles/A40974-2002Jan13.html>). Worse, NACC knowingly misuses the data demonstrably non-utile for their purported purpose. Being on notice of these facts, NOAA is equally culpable.

2. Failure to Perform Requisite Scientific Review Violates FDQA

USGCRP’s development of NACC drew congressional attention to particular shortcomings. Specifically, leaders in the United States House of Representatives repeatedly attempted to herd USGCRP and its subsidiary bodies to follow the scientific method regarding particular matters, specifically the regional and sectoral analyses. Indeed the concerns had become so acute that these leaders were compelled to promote a restriction prohibiting relevant agencies from expending appropriated monies upon the matter at issue, unless consistent with the plain requirements of the GCRA of 1990, through language in the conference report accompanying Public Law 106-74:

“None of the funds made available in this Act may be used to publish or issue an assessment required under section 106 of the Global Change Research Act of 1990 unless (1) the supporting research has been subjected to peer review and, if not otherwise publicly available, posted electronically for public comment prior to use in the assessment; and (2) the draft assessment has been published in the

Federal Register for a 60 day public comment period.”¹

USGCRP did not perform the conditions precedent for valid science as reaffirmed in that language. Instead USGCRP produced and now disseminates a NACC knowingly and expressly without the benefit of the supporting science which not only is substantively required but which Congress rightly insisted be performed and subject to peer review prior to releasing any such assessment.

These attempts to rectify certain NACC shortcomings were made in advance of USGCRP producing the NACC, but were never rectified. These failures justify Petitioners’ request that USGCRP cease present and future NACC dissemination unless and until its violations of FDQA are corrected. In addition to NACC violating FDQA’s “objectivity” and “utility” requirements, as “influential scientific or statistical information”, NACC also fails its “reproducibility” standard, setting forth transparency regarding data and methods of analysis. Per OMB, this represents “a quality standard above and beyond some peer review quality standards.”²

Given USGCRP’s refusal to wait for completion of the underlying science and their response to the relevant oversight chairmen, it is manifest that USGCRP ignored or rejected these lawmakers’ requests, including by the relevant oversight Chairmen and produced a deeply flawed Assessment, knowingly and admittedly issuing a “final” Assessment without having complied with Congress’s direction to incorporate the underlying science styled as “regional and sectoral analyses,”³ while also admitting that the requisite scientific foundation would be completed imminently. For these same reasons dissemination presently violates FDQA.

3. NACC Not in Fact Peer Reviewed, the Record Makes Clear

Finally, NACC suffers from having received no authentic peer review, in violation of FDQA’s “objectivity” and “utility” requirements. As “influential scientific or statistical

¹ House Report 106-379, the conference report accompanying H.R. 2684, Department of Veterans Affairs and Housing and Urban Development, and Independent Agencies Appropriations Act, 2000 (Pub.L. 106-74), p. 137.

² As established in *CEI et al. v. Clinton*, Congress detailed for USGCRP its more obvious scientific failures which ensure that NACC now violates FDQA, noting USGCRP’s apparent failure to comply with such conditions and seeking assurance that such circumstances would be remedied. USGCRP via OSTP drafted a response to House Science Committee Chairman Sensenbrenner, evasively failing to specifically address the concerns raised by these Members. Chairmen Sensenbrenner and Calvert specifically took issue and/or disputed these non-responses in the July 20, 2000 letter, reiterating their request for compliance with the law’s requirements. Nonetheless, the failings persist.

³ This despite that the two principal NACC sections are “Regions,” and “Sections.” (See <http://www.gcric.org/nationalassessment/overvpdf/1Intro.pdf>).

information”, for these reasons NACC also fails the “reproducibility” standard, setting forth transparency regarding data and methods of analysis, “a quality standard above and beyond some peer review quality standards.”

Once an advisory committee was chartered pursuant to the Federal Advisory Committee Act (FACA) in 1998, Dr. John Gibbons’ communication of January 8, 1998 to the first Designated Federal Officer (DFO) Dr. Robert Corell indicates a sense of urgency was communicated to the panel by political officials. Further, statements in the record and major media outlets, including but in no way limited to those from certain anonymous if purportedly well placed sources, indicate a perception among involved scientists that political pressures drove the timing and even content of this draft document. This is manifested by the lack of opportunity to comment for parties whose comment was formally requested as part of a “peer review” of NACC.

This sense of urgency is reflected in, among other places, comments the Cooler Heads Coalition obtained via the Freedom of Information Act, made by parties from the National Laboratories asked by the Department of Energy to comment on the Draft. In addition to an emphasis on speed as opposed to deliberation, the report’s emphasis on “possible calamities” to the detriment of balancing comments which were widely offered, and rampant criticism of the reliance on only two significantly divergent models for the pronouncements made, these comments are exemplified by the following samples from well over a dozen such complaints accessed through FOIA, **also received by and in the possession of USGCRP**:

- 1) “This review was constrained to be performed within a day and a half. This is not an adequate amount of time to perform the quality of review that should be performed on this size document” (Ronald N. Kickert, 12/08/99);
- 2) “During this time, I did not have time to review the two Foundation Document Chapters” (Kickert, 12/20/99);
- 3) “Given the deadline I have been given for these comments, I have not been able to read this chapter in its entirety” (William T. Pennell);
- 4) “**UNFORTUNATELY, THIS DOCUMENT IS NOT READY FOR RELEASE WITHOUT MAJOR CHANGES**” (CAPS and bold in original)(Jae Edmonds);
- 5) “This is not ready to go!” (William M. Putman).

These comments reflect an alarming implication of timing over substance, and of a product whose final content appears predetermined. Patrick Michaels’ comments, and the absence of apparent change in response to his alarming findings, reinforces this troubling reality. Notably, the product was released and continues to be disseminated without offering an actual peer review or otherwise addressing the concerns expressed.

In conclusion, the National Assessment on Climate Change fails to meet FDQA and/or OMB and Commerce/NOAA Guidelines regarding Data Quality. **As a consequence, Commerce/NOAA must immediately cease electronic and other dissemination of the unacceptable data provided by the National Assessment on Climate Change, as defined by OMB, and now Commerce and NOAA, and described, *supra*.**

Sincerely,

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