



# Endangering Access to the Scientific Record:

Information suppression undermines the public comment process  
for the proposed repeal of the 2009 Endangerment Finding

Environmental Data and Governance Initiative's Comment on the Environmental  
Protection Agency (EPA) Proposed Rule: Reconsideration of 2009 Endangerment Finding  
and Greenhouse Gas Vehicle Standards (Docket No. EPA-HQ-OAR-2025-0194)

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*The Environmental Data and Governance Initiative (EDGI) is a network of academics, technologists, and non-profit professionals that promotes communities' right to know, evidence-based policy-making, and public interest science. We document, contextualize, and analyze environmental data, information, and governance practices through multidisciplinary and cross-professional collaborative work. EDGI includes more than 100 members in North America residing in 15 U.S. states.*

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**The Environmental Data and Governance Initiative (EDGI) welcomes the opportunity to comment on the Environmental Protection Agency (EPA) Proposed Rule: Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards (Docket No. EPA-HQ-OAR-2025-0194) under Section 202(a) of the Clean Air Act.**

## I. Introduction

EDGI opposes the proposal to rescind the Environmental Protection Agency's (EPA) Endangerment Finding under Section 202(a) of the Clean Air Act. EDGI analyzes changes to environmental governance policies and practices, including the federal provision of public information, and our findings demonstrate that the EPA has restricted public access to critical information underpinning the Endangerment Finding. The EPA is responsible for ensuring the public has "[access to accurate information sufficient to effectively participate in managing human health and environmental risks](#),"<sup>1</sup> but EDGI has documented the unjustified removal of resources about greenhouse gases, climate change, and human health from EPA and other federal agency websites, undermining EPA's mission. The removal and alteration of public information relevant to the Endangerment Finding undermines the integrity of this public comment period, the public's ability to understand and respond to environmental risk, and EPA's ability to fulfill its mission.

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<sup>1</sup> US Environmental Protection Agency, "Our Mission and What We Do," EPA, <https://www.epa.gov/aboutepa/our-mission-and-what-we-do>. Accessed September 21, 2025.

## II. Information suppression undermines the APA

### Removal and alteration of information on agency websites

In order to effectively participate in the regulatory process, the public must have access to accurate, authoritative information about a proposed rule to inform and substantiate their public comments. Agency websites serve as crucial resources for the public to understand the scientific, legal, and historical underpinnings of regulations, and the impacts of their promulgation or repeal. To formulate an informed public comment on the proposed repeal of the Endangerment Finding, the public relies on access to information about climate change, its impacts on human health, and the possible impacts of reducing regulations on greenhouse gas emissions.

In the months preceding the proposed repeal of the Endangerment Finding, the EPA and other federal agencies significantly limited public information related to the connections between greenhouse gas emissions, climate change, and human health, which underpin the Endangerment Finding. EDGI has [documented over 900 significant changes](#) to content or access to environmental information across more than 4,000 federal webpages since January 2025.<sup>2</sup> Below, we highlight several changes that exemplify the reshaping of the climate change information landscape during the regulatory process to repeal the Endangerment Finding. These changes make it more difficult for individuals to review the scientific record on climate change and health, and their policy and planning implications, before submitting their public comments.

Across the EPA and other federal agencies' websites, many pages providing vital information have been taken down (and now return 404 errors) or have had significant content changes. For example, in August, the EPA removed several pages from its Climate Change Adaptation Resource Center website, including the "Implications of Climate Change," "Regional Climate Impacts," and "Public Health and Climate Change Adaptation" webpages, among others. Additionally, the EPA has removed its entire Resilient Investments website, which focused on climate change adaptation strategies. The EPA removed all of these resources during this public comment period on the proposed rescission of the Endangerment Finding.

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<sup>2</sup> EDGI, "Federal Environmental Web Tracker about Page," Environmental Data and Governance Initiative, 2025, <https://envirodatagov.org/federal-environmental-web-tracker-about-page/>.

Other federal agencies have removed even more extensive climate change information from their websites over the last several months. For example, in June, the website for the interagency US Global Change Research Program (USGCRP) was removed, along with access to the National Climate Assessments (NCAs) it hosted. [The USGCRP was developed](#) to strengthen scientific understanding of global climate change and its impacts, and to produce information that helps support policy responses. Additionally, key resources were removed from the National Oceanographic and Atmospheric Administration's (NOAA) [climate.gov](#) website, such as its ["Climate Literacy Guide" in January](#),<sup>3</sup> and all of the resources in its "Teaching Climate" repository in April. The Federal Emergency Management Agency (FEMA) first [renamed its "Climate Resilience" website to "Future Conditions" in January](#),<sup>4</sup> and then removed the website altogether in March.

EDGI has also documented the removal of several federal environmental justice screening tools, which has deprived the public of access to data that has been used in the notice and comment process. Notably, EPA's EJScreen, which provided a nationally consistent dataset for mapping demographic and environmental information, [was removed earlier this year](#),<sup>5</sup> along with its landing page, many technical resources, pages to download the data for offline use, and servers that distributed the spatial data behind the tool. Other removals include the White House Council on Environmental Quality's (CEQ) [Climate and Economic Justice Screening Tool \(CEJST\)](#),<sup>6</sup> which was used to identify communities disproportionately burdened by environmental hazards and poverty for the allocation of federal funding and projects; the DOE's Low Income Energy Affordability (LEAD) tool; and the Department of Transportation's (DOT) Screening Tool for Equity Analysis of Projects (STEAP). In February, FEMA removed its [Future Risk Index](#), which incorporated climate change into risk projections for natural hazards.<sup>7</sup> These removals limit local and state governments'

<sup>3</sup> EDGI, "NOAA Removes the 2024 Climate Literacy Guide from Its Website," Environmental Data and Governance Initiative, March 24, 2025,

<https://envirodatagov.org/noaa-removes-the-2024-climate-literacy-guide-from-its-website/>.

<sup>4</sup> EDGI, "FEMA Renames 'Climate Resilience' Website 'Future Conditions,'" Environmental Data and Governance Initiative, February 13, 2025,

<https://envirodatagov.org/fema-renames-climate-resilience-website-future-conditions/>.

<sup>5</sup> EDGI, "EPA Removes EJScreen from Its Website," *Environmental Data and Governance Initiative*, February 12, 2025. <https://envirodatagov.org/epa-removes-ejscreen-from-its-website/>.

<sup>6</sup> EDGI, "Trump Removes Access to CEJST, Our New Coalition Restores It," *Environmental Data and Governance Initiative*, January 31, 2025.

<https://envirodatagov.org/trump-removes-access-to-cejst-our-new-coalition-restores-it/>.

<sup>7</sup> View a version rec-created by Public Environmental Data Partners coalition member Fulton Ring, here: <https://fulton-ring.github.io/nri-future-risk/>. The tools was previously available from FEMA here:

<https://experience.arcgis.com/experience/d41df9a4c73a4e0ea540554c5a867f60/page/EAL-Page>.

abilities to prepare for climate impacts, build resiliency, mitigate environmental and climate-related risks, and communicate with their constituents.

Select examples of federal agency website changes that undermine the integrity of this public comment period by restricting public access to relevant information are listed in tables 1, 2, and 3 below.

**Table 1:** Select Environmental Protection Agency webpages that have been removed from public access during the public comment period for the proposed rescission of the Endangerment Finding.

Environmental Protection Agency Page Deletions	
Page Name	Date Removed
"Implications of Climate Change"	8/11/2025
"Climate Impacts and the EPA"	8/11/2025
"Regional Climate Impacts"	8/11/2025
"State Climate Impacts"	8/11/2025
"Indoor Air Quality and Climate Change Adaptation"	8/11/2025
"Outdoor Air Quality and Climate Change Adaptation"	8/11/2025
"Public Health and Climate Change Adaptation"	8/11/2025
"Air Quality and Health- Climate Change Adaptation"	8/11/2025
"Water Quality and Health- Climate Change Adaptation"	8/11/2025
"Chemical Exposure and Health- Climate Change Adaptation"	8/11/2025
"Extreme Heat and Health- Climate Adaptation"	8/11/2025

**Table 2:** Select Environmental Protection Agency webpages that have undergone substantial changes right before or during the public comment period for the proposed rescission of the Endangerment Finding.

Substantial Changes to EPA Webpages		
Page Name	Change Description	Date Changed
"Smart Growth and Climate Change"	Removed access to the 2023 National Climate Assessment, which examined the effects of climate change in regions around the United States.	7/14/2025
"Searchable Case Studies for Climate Change Adaptation"	Removed searchable case studies about climate change adaptation, including some about public health, and renamed the page to "Searchable Case Studies for Preparedness and Resilience"	8/8/2025
"Risk Assessment"	Removed the large text box explaining and linking to the EPA's new EcoRisk Portal and moved the link to a harder to locate area on the page	8/27/2025

**Table 3:** Webpages of other federal agencies that have undergone substantial changes during or soon before the public comment period for the proposed rescission of the Endangerment Finding.

Substantial Changes to other Federal Webpages		
Page Name	Change Description	Date Changed
Federal Emergency Management Agency: "Future Risk Index"	Removal of FEMA's "Future Risk Index," a tool that incorporated climate change into projections about the economic impacts of disasters	2/2025
National Oceanic and Atmospheric Administration: Essential Principles for Understanding and Addressing Climate Change	Removal of the "Climate Literacy Guide," which was developed to educate the public on the science behind climate change, its anthropogenic causes, and possible solutions	2/11/2025

Substantial Changes to other Federal Webpages		
National Oceanic and Atmospheric Administration: "Teaching Climate"	Removal of all 706 resources that had been included in NOAA's "Teaching Climate" website	5/6/2025
US Global Change Research Program: website	Removal of the entire <a href="https://globalchange.gov">globalchange.gov</a> website, which hosted the 5th National Climate Assessment, among other critical climate change resources geared toward the lay public and policy-makers	7/1/2025
Department of Energy: "Climate Change"	Page was renamed to "Climate" and educational resources and information about climate change were deleted and replaced with the DOE report, "A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate"	7/30/2025
NIEHS: "The NIH Almanac"	Removal of text on the link between climate change and human health	8/26/2025
NIEHS: "Important Events in NIEHS History"	Deletion of information about the health effects associated with climate change from the Important Events in NIEHS History timeline	8/26/2025

EDGI's analyses of the timing and extent of changes to information about climate change demonstrate that the current administration's information alteration and suppression undermine the integrity of the notice-and-comment process required by the Administrative Procedure Act (APA)<sup>8</sup> for this proposed rule and interferes with the public's ability to interpret the extensive research on this topic. While the proposed rule explicitly seeks comment on "why the approach taken in the Endangerment Finding remains reasonable given the legal and scientific developments discussed in this proposal" ( [90 FR at 36311](#)), the agency has taken steps to hollow this request. By removing key information across federal webpages that address the links between greenhouse gases, climate change, and human health and well-being, the EPA greatly reduces people's ability to

<sup>8</sup> 5 U.S.C. 553 - Rule making (2024).

<https://www.govinfo.gov/app/details/USCODE-2024-title5/USCODE-2024-title5-partI-chap5-subchapII-sec553>.

include this information in their analysis of the proposed rescission of the Endangerment Finding.

## Critical documents missing from the docket

The EPA failed to include multiple critical documents in the docket for the proposed repeal of the 2009 Endangerment Finding, Docket ID No. EPA-HQ-OAR-2025-0194. Regulatory dockets are supposed to contain the documents an agency uses to develop its rulemaking, in this case the proposal to repeal the 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards. However, while the proposed rule states that the Administrator considered the Third, Fourth, and Fifth National Climate Assessments (NCA3, NCA4, and NCA5) produced by the USGCRP and the Fifth and Sixth Assessment Reports by the United Nations International Panel on Climate Change (AR5 and AR6) ( [90 FR at 36308](#)), none of these leading, globally-respected synthesis reports are included in the docket in full. A search in the docket on [regulations.gov](#) for “National Climate Assessment” produces only two results: (1) a request for correction to the NCA5 based on President Trump’s recent executive order 14303 “Restoring Gold Standard Science,” and (2) Volume 1 of the Fourth National Climate Assessment.<sup>9</sup> Searching for the report abbreviation “NCA” returns zero results. Searching for “Fifth Assessment Report,” “AR5,” and “AR6” return zero results, and searching for “Sixth Assessment Report” returns a single result, “Climate Change 2021 The Physical Science Basis,” which is the contribution of Working Group 1 to the AR6.<sup>10</sup> However, the actual content for that resource is restricted and is not actually contained in the docket.<sup>11</sup> Of the five reports “by the U.S. Government and relevant international bodies” considered by the Administrator in the development of this proposed to rescind

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<sup>9</sup> Search results can be found here:

<https://www.regulations.gov/docket/EPA-HQ-OAR-2025-0194/document?filter=national%20climate%20assessment>. Volume I of the Fourth National Climate Assessment is an important resource for the public. It can be cited as USGCRP, 2017: Climate Science Special Report: Fourth National Climate Assessment, Volume I [Wuebbles, D.J., D.W. Fahey, K.A. Hibbard, D.J. Dokken, B.C. Stewart, and T.K. Maycock (eds.)]. U.S. Global Change Research Program, Washington, DC, USA, 470 pp., doi: 10.7930/J0J964J6.

<sup>10</sup> Search results can be found here:

<https://www.regulations.gov/docket/EPA-HQ-OAR-2025-0194/document?filter=sixth%20assessment%20report>.

<sup>11</sup> See docket document

<https://www.regulations.gov/document/EPA-HQ-OAR-2025-0194-0085>, noting that the report is not included due to copyright restrictions. Ironically, the report is published open access: <https://www.cambridge.org/core/books/climate-change-2021-the-physical-science-basis/415F29233B8BD19FB55F65E3DC67272B>.



that Finding ([90 FR at 36308](#)), only one volume of one report is included in the regulatory docket.

While the EPA failed to include these world-renown, extensive reports about anthropogenic contributions to climate change, climate change projections, and the physical, economic, spiritual, and health impacts of climate change (NCA3, NCA4, NCA5, AR5, AR6), the EPA has elected to include documents such as a Wall Street Journal opinion article, "Nobelists for Harris are Unburdened by Proof: Economists who sign letters of support for the Democrat should be ready to present their evidence," which presumably factored into the EPA's development of this proposed rule.<sup>12</sup>

The failure of the EPA to include these leading reports about climate change and its impacts directly undermines the public's ability to provide informed public comments for this rulemaking. Taken alongside the extensive removals of information on EPA and other agencies' websites described in Section I of this public comment, the Environmental Protection Agency is actively suppressing science-based information about the impacts of climate change on the U.S.

### III. Proposed rule ignores robust evidence of harms

In this proposed rule, the EPA primarily uses one flawed report to substantiate its assertion that the EPA "unreasonably" analyzed the scientific record in the 2009 Endangerment Finding and that new developments cast doubt on the findings (Section IV, Part B-1). The proposed rule claims that the Administrator considered available assessments by the U.S. government and relevant international bodies, including the Third, Fourth, and Fifth National Climate Assessments (NCAs) reported by the US Global Change Research Program (USGCRP) and the fifth and sixth Assessment Reports by the Intergovernmental Panel on Climate Change (IPCC) ([90 FR at 36307](#)). However, the proposed rule's "Climate science discussion" (Section IV, Part B-1) relies primarily on information from the Department of Energy's 2025 Climate Working Group (CWG) report.

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<sup>12</sup> See the docket document here:

<https://www.regulations.gov/document/EPA-HQ-OAR-2025-0194-0050>.

[The CWG report has been criticized](#) for misrepresenting the scientific literature and omitting important data and context by climate experts.<sup>13</sup>

The EPA asserts that the Administrator considered information in the NCAs to substantiate its proposed rule, and requests the public to consider new scientific evidence in their public comments, but it simultaneously is limiting public access to such evidence. The proposed rule states that “The EPA seeks comment... on whether, due to new scientific information and developments since the 2009 Endangerment Finding, there is a strong enough scientific record to support an affirmative finding that GHG emissions from section 202(a) sources cause or contribute to air pollution which may reasonably be anticipated to endanger public health or welfare” ([90 FR at 36310](#)). In July, the NCAs along with other leading scientific backing for the Endangerment Finding became inaccessible across EPA and other agency websites. As a result, the public cannot readily access the very reports the EPA refers to, and also criticizes, in the proposed rule on which they are commenting.

By contrast, the 2009 Endangerment Finding drew from scientific assessments of the IPCC, USGRCP, and National Academies of Sciences, Engineering, and Medicine (NAS), because they provided the most comprehensive and in-depth analysis of climate science and had a very high standard of peer review ([74 FR at 66510–11](#)). These scientific assessments remain preeminent sources of climate science.

The confidence that these expert panels (IPCC, USGRCP, and NAS) have that climate change endangers human health has only increased since 2009. For example, backed by 330 references, the [Fifth NCA \(2023\)](#) describes with very high confidence multiple ways climate change is harming physical, mental, spiritual, and community health through increasing frequency and intensity of extreme heat, drought, wildfires, and cases of infectious and vector-borne diseases.<sup>14</sup> Additionally, [NOAA’s “Global and Regional Sea Level Rise Scenarios for the United States” \(2022\)](#) details harms to coastal communities of

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<sup>13</sup> Andrew Dessler and Robert E Kopp, “Climate Experts’ Review of the DOE Climate Working Group Report,” *ESS Open Archive*, September 9, 2025, <https://doi.org/10.22541/essoar.175745244.41950365/v1>.

<sup>14</sup> U.S. Global Change Research Program, “Chapter 15: Human Health,” in *Fifth National Climate Assessment*, ed. A.R. Crimmins et al. (Washington, DC: U.S. Global Change Research Program, 2023), <https://doi.org/10.7930/NCA5.2023.CH15>.

sea-level rise associated with climate change.<sup>15</sup> Contrary to the EPA's assertion in Section IV, part B-1 of the proposed rule that extreme weather events have not increased relative to historic highs, there is increasing evidence that global warming contributes to more dangerous storms and an increased risk of compound extreme events.<sup>16</sup>

The EPA relies on uncertainty cited in the Endangerment Finding to support its proposed repeal, an approach that employs poor logic and a misunderstanding of the scientific process. The proposed rule states that "The Endangerment Finding itself acknowledged significant uncertainties related to climate change and its potential impacts..." ( [90 FR at 36308](#)). Acknowledging uncertainty is a fundamental and inherent part of the scientific method, and particularly critical in climate modeling. Framing uncertainty as bad not only wrongfully undermines the rigorous science used to support the Endangerment Finding, but also works to discredit the science on which we rely and shape much of our modern world.

Additionally, the proposed repeal relies on illogical reasoning that the Endangerment Finding should have considered adaptation and mitigation measures in assessing climate risk. The proposal states that "The risks anticipated in the Endangerment Finding resulted... from the Agency's decision at the time to categorically exclude consideration of adaptation and mitigation" ( [90 FR at 36309](#)). Contextualized by the Agency's own reliance on uncertainty to cast doubt on the Endangerment Finding, it is unreasonable to simultaneously expect a consideration of adaptation and mitigation efforts that are significantly less predictable, and over which the agency has minimal control. Moreover, while implying that mitigation and adaptation efforts would impact climate risk, the agency is simultaneously working to discourage these same efforts. Regulations are an integral form of adaptation and mitigation that would ostensibly impact the risks of climate

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<sup>15</sup> W. V. Sweet et al., *Global and Regional Sea Level Rise Scenarios for the United States: Updated Mean Projections and Extreme Water Level Probabilities Along U.S. Coastlines*, NOAA Technical Report NOS 01 (Silver Spring, MD: National Oceanic and Atmospheric Administration, National Ocean Service, 2022), 111,

<https://oceanservice.noaa.gov/hazards/sealevelrise/noaa-nostechrpt01-global-regional-SLR-scenarios-US.pdf>

<sup>16</sup> Marvel, Kate, Wei Su, Robert Delgado, Seth Aarons, Aditi Chatterjee, Maria E. Garcia, Zeke Hausfather, Katharine Hayhoe, David A. Hence, Erica B. Jewett, Alex Robel, Deepti Singh, Aradhna Tripathi, and Russell S. Vose, "Ch. 2. Climate Trends," in *Fifth National Climate Assessment*, ed. Alison R. Crimmins, Christian W. Avery, David R. Easterling, Kenneth E. Kunkel, Benjamin C. Stewart, and Thomas K. Maycock (Washington, DC: U.S. Global Change Research Program, 2023), <https://doi.org/10.7930/NCA5.2023.CH2>

change, with the Endangerment Finding serving as the foundation for many such regulations.

## IV. Conclusion

The EPA suppressed critical information about climate change and human health and well-being in advance of and during the public comment period for its proposal to rescind the 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards, undermining the Administrative Procedure Act and the integrity of this public comment solicitation. EDGI has documented the removal of information linking climate impacts to public health across EPA and other agency websites in recent months. Furthermore, the key scientific documents underpinning the Endangerment Finding and more recent climate science developments, such as the USGCRP National Climate Assessments and the IPCC Assessment Reports, which the Agency cites as equivocal or misleading, are not available in the regulatory docket for the proposed repeal. By restricting access to key agency informational resources, as well as internationally acclaimed reports on climate impacts and the risks of climate change to human health, the EPA is actively suppressing the very information the public relies on to engage in the regulatory process, and jeopardizing the integrity of the Administrative Procedure Act and notice-and-comment rulemaking.

EDGI opposes the EPA's proposal to rescind the Endangerment Finding and urges the Agency to reverse course, retain the 2009 Endangerment Finding, and make the information the public relies on for their health and wellbeing accessible again.