

## Caiazza Comment on the Alleged Climate Crisis

### Summary

I recommend that the Final Scoping Plan include a conditional schedule that considers the availability of necessary technology and potential impacts to reliability and affordability before implementing certain control measures. I expect the response will be that because there is an existential threat due to climate change and we are seeing the effects of climate change now that we cannot wait to act.

I provide references by noted experts that explain why there isn't a climate crisis and why the Draft Scoping Plan's reliance on the Intergovernmental Panel on Climate Change summaries for policy makers is mis-placed. I also explain that it is inappropriate to claim that every observed extreme weather event is evidence of climate change.

### Introduction

This comment was submitted at the end of the comment period to support my contention that it is more important that the Final Scoping Plan address reliability, affordability, and environmental impact issues on a conditional schedule than to rush ahead on an arbitrary timeline. The rationale that we must act now because there is an existential climate crisis does not withstand scrutiny. These comments highlight comments made by two experts that explain why there isn't a crisis and summarize my blog page discussion of the difference between weather and climate.

For the record, I have bachelors and master's degrees in meteorology, was certified as consulting meteorologist, and have been employed as a meteorologist for over 45 years.

### Critical Comments by Happer and Lindzen on the SEC Rule

Andy May is a writer and President of the Center for the Study of Carbon Dioxide and Global Change. He was recently asked to explain the U.S. controversy over the proposed Securities & Exchange Commission climate change rule for European audiences. His essay at [clintel.org](http://clintel.org) describes the comments made by [William Happer](#), Princeton Professor, emeritus, and [Richard Lindzen](#), MIT Professor, emeritus, on the have reviewed the proposed rule and filed a [critical comment](#) on the rule with the SEC. In addition, they have filed an amicus curiae [court brief](#) with the U.S. Court of Appeals for the Fifth Circuit stating that they do not believe there is a climate-related risk related to burning fossil fuels, and the resulting CO<sub>2</sub> and other greenhouse gas (GHG) emissions.

Much like the Climate Act, May explains that:

The proposed SEC rule does not establish that there is a climate risk, they simply assume there is, based upon President Biden's [Executive Order 13990](#) and the various [IPCC Reports](#). The amicus curiae brief deals with the executive order and its underlying technical support document's ([TDS](#)) social cost of carbon (SCC) calculations.

Happer, who has studied possible CO<sub>2</sub> related climate change for over 40 years, succinctly states his opinion:

*"There isn't a climate crisis. There will not be a climate crisis. It is utter nonsense."*

Lindzen has studied climate even longer than Happer, his comment:

*“What historians will definitely wonder about in future centuries is how deeply flawed logic, obscured by shrewd and unrelenting propaganda, actually enabled a coalition of powerful special interests to convince nearly everyone in the world that carbon dioxide from human industry was a dangerous, planet-destroying toxin.*

*“It will be remembered as the greatest mass delusion in the history of the world – that carbon dioxide, the life of plants, was considered for a time to be a deadly poison.”*

May goes on to describe the Happer and Lindzen comments:

The SEC assumption is made because many prominent climate scientists share an opinion (the so-called “consensus”) that humans are affecting the world’s climate by burning fossil fuels and emitting large amounts of CO<sub>2</sub>. They also share an opinion that this is a bad thing. However, in the scientific world, the opinions of scientists and politicians are not relevant. This is not to say that anthropogenic climate change or the possibility of an anthropogenic climate change disaster are disproven, it is just to say that no valid evidence exists to support these hypotheses. This concept is examined in more detail [here](#).

May describes the arguments made:

Neither Happer nor Lindzen believe the SEC and TDS arguments are scientifically valid. They state that reliable scientific theories make predictions that are later validated by observations. They are not from a scientific consensus, government opinion, peer review, or manipulated data. In the words of Professor Richard Feynman, as quoted by Happer and Lindzen:

*“[W]e compare the result of [a theory’s] computation to nature, ... compare it directly with observations, to see if it works. If it disagrees with experiment, it is wrong. In that simple statement is the key to science.” Richard Feynman, [The Character of Physical Law](#) (1965), p. 150.*

Models have been created to show the hypothetical human-caused changes to climate and the supposed damage these changes might cause. Unfortunately, or fortunately, perhaps, the models [do not compare well](#) to observations. Using Feynman’s rule, this invalidates the catastrophic climate change hypothesis. See [here](#) for more on the model/observations mismatch.

The description of the Happer and Lindzen comments are applicable to the Climate Act. May writes:

Happer and Lindzen also show that President Biden’s executive order, which mandates agencies determine the social benefits of *reducing* GHG emissions, is seriously flawed. The executive order ignores the *benefits of additional* CO<sub>2</sub> and other GHGs, aka the *negative* costs.

Biden’s executive order relies very heavily on the famous [IPCC climate change reports](#) of the past thirty years, but as Happer and Lindzen make clear the IPCC rules state that all governments approve the IPCC summaries for policymakers (SPMs) at the head of each IPCC report. The SPMs are government opinions, not scientific documents. Everything in the IPCC

report must conform to the SPM, thus the scientific content must be adjusted to match the government opinions, a clear violation of the scientific principle that only a comparison to real-world observations can validate a theory. Even after a theory successfully predicts specific observations, the theory can still be challenged with additional observations, a theory is never proven, it only survives challenges. Government dictates are not validation.

Both the IPCC and Biden's executive order ignore the abundant evidence that additional CO<sub>2</sub> is beneficial. Happer and Lindzen remind us that nearly all the food we eat and all the oxygen we breathe comes from the photosynthesis of CO<sub>2</sub> and water. Plants evolved when atmospheric CO<sub>2</sub> concentrations were several thousand parts per million (PPM), compared to the paltry 400 PPM in the atmosphere today. All plants grow faster with more CO<sub>2</sub>, and they use less water per pound of growth, which is why modern greenhouses add CO<sub>2</sub> to their air.

Happer and Lindzen emphasize that agricultural crop yields have benefited from the addition of fossil fuel generated CO<sub>2</sub> in the atmosphere. Global agricultural output has [increased almost 300%](#) since 1961 due to additional CO<sub>2</sub>, better seeds, more and better fertilizer (from fossil fuels), and better water management, more details can be seen [here](#).

In summary, Happer and Lindzen write that the SEC and Executive Order 13990 section 5 are based on multiple violations of the scientific method and will be disastrous for poor people worldwide, future generations, and the United States. They note that both the executive order and the SCC rule violate the 1993 Supreme Court definition of "scientific knowledge," the *Daubert* decision reads:

*"[I]n order to qualify as 'scientific knowledge,' an inference or assertion must be derived by the scientific method, any and all scientific testimony or evidence admitted [must be] ...reliable," "tested," and "supported by appropriate validation." Daubert v. Merrell Pharmaceutical, Inc., 509 U.S. 579 (1993) (emphasis added)*

I concur completely with opinions of Happer and Lindzen. I believe that their comments support my contention that it is appropriate to address reliability, affordability, and environmental impact issues on a conditional schedule than to rush ahead on an arbitrary timeline.

### **Weather versus Climate**

Another argument favoring immediate action is that the effects of climate change can be observed today. The distinction between weather and climate is not understood by the leadership of the Climate Action Council. Since the Council meetings began the remarks by the co-chairs never lost the opportunity to claim that the latest extreme weather events were proof of climate change. I [predicted](#) that the floods in New York City associated with the remnants of Hurricane Ida would be mentioned at the next Council meeting and [it was](#). However, a summary of [past precipitation data](#) showed that Ida wasn't an example of climate change.

In both the Climate Act and Council meetings weather and climate are routinely confused. According to the National Oceanic and Atmospheric Administration's [National Ocean Service](#) "Weather reflects short-term conditions of the atmosphere while climate is the average daily weather for an extended period of time at a certain location." The referenced article goes on to explain "Climate is what you expect,

weather is what you get.” Also keep in mind that the standard climatological average is 30 years. In order to think about a change in today’s climate averages you really should compare the current 30 years against the previous 30 years. In order to get a trend, you need to look at as much data as possible. On the face of it that might seem easy but the reality is that the conditions for a representative trend are difficult to achieve. Ideally you need to use the same instruments, the same methodology, and keep the conditions around the observing location the same.

I have [documented many instances](#) where someone has claimed that a particular weather event was caused by climate change or is an indicator of climate change but upon close scrutiny the most that can be said is that climate change might have tweaked the weather extreme. I have never seen an analysis that makes a persuasive case that the event occurred because of climate change.

In addition, in other [comments](#) I showed that any expectation that the Climate Act will have any detectable effect on the severity of current or future climate change is mis-placed because the expected impact on global warming is an immeasurable 0.01°C by the year 2100. Furthermore, New York’s emissions are less than one half of one percent of total global emissions and global emissions have been increasing by more than one half of one percent on average since 1990. The point of this section is that there is little to suggest that delaying reductions of GHG emissions will have any effect on the purported effects of climate change on New York.

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I prepared this comment because the general public does not understand the difference between weather and climate or the tremendous uncertainties associated with climate modeling. I have [written extensively](#) on implementation of the Climate Act because I believe the ambitions for a zero-emissions economy outstrip available renewable technology such that it will adversely affect [reliability](#) and [affordability, risk safety, affect lifestyles](#), will have [worse impacts on the environment](#) than the purported effects of climate change in New York, and [cannot measurably affect global warming](#) when implemented. The opinions expressed in this document do not reflect the position of any of my previous employers or any other company I have been associated with, these comments are mine alone.

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