



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JAN 19 2000

OFFICE OF
AIR AND RADIATION

Mr. Jim Tozzi
Center for Regulatory Effectiveness
Suite 700
11 Dupont Circle, N.W.
Washington, DC 20036

Dear Mr. Tozzi:

Thank you for your letter dated May 26, 2000, addressed to Administrator Browner. In this letter, you raise two issues. First, you request that EPA deny the petition for regulation of greenhouse gases that EPA received from the International Center for Technology Assessment (CTA) and others. Second, you request that EPA make revisions to information on EPA's global warming website. Your letter was referred to me because my office is responsible for both addressing the CTA petition and maintaining the Agency's global warming website.

You requested that EPA's Chief Information Officer consider the issues you raised relating to information on EPA's website as part of his responsibility to monitor compliance with OMB Circular A-130. However, this Circular contains no requirements to establish the type of complaint resolution process proposed in your letter for correcting general scientific information on EPA's Internet site.¹ EPA handles such requests by assigning them to the office that maintains the relevant information on the website and has the necessary expertise on the subject.

On October 20, 1999, EPA received a petition from CTA and other entities requesting that the Agency regulate greenhouse gas emissions from new motor vehicles. EPA has made no decision whether to grant or deny the petition. EPA has established a public docket and plans within the next few weeks to publish a notice asking for public comment on the petition. EPA has placed a copy of your letter in the public docket EPA has established for the CTA Petition (docket number A-2000-04). Your request to deny and dismiss the CTA petition will be considered along with all other public comments that EPA receives.

We have carefully reviewed your suggestions regarding the EPA global warming website, and we appreciate your comments. EPA strives to provide an accurate assessment of the science to the public. You suggested three changes regarding the website. Our response to each of those suggestions is as follows:

¹ For EPA databases, however, EPA has initiated an error correction process ensuring the prompt correction of data errors, as detailed in a July 26, 2000, letter to you from Mark Luttner, Director of EPA's Office of Information Collection.

- (1) “Address scientific uncertainties and limitations on all relevant pages.” You note that EPA provides appropriate information on the uncertainties associated with the science of climate change, but suggest that a specific reference and hyperlink be added to additional pages of the website. A hyperlink to the “uncertainties” web page is already included prominently on the Home Page and all of the “frequently asked questions” pages. We agree, however, that additional links would improve the website and have added the “uncertainties” link to additional pages within the website. The “uncertainties” page has also been updated to include a link to the more detailed discussion of climate models found at “Future Climate -- U.S. Climate -- Climate Models.” With regard to your suggestion to include a uniform statement about uncertainty on each web page, EPA believes it is more appropriate to continue our practice of providing for each issue an accurate explanation that reflects relevant uncertainties.
- (2) “Provide Archive of ‘Before’ and ‘After’ Text of Changes to Website.” The main purpose of EPA’s website is to provide the best available information to the public. As the state of scientific consensus evolves, EPA will update the website accordingly. For example, the Intergovernmental Panel on Climate Change (IPCC) is currently drafting its Third Assessment Report on the state of the science. When that process is complete, EPA will update the website. That update will likely include a discussion of major changes between the findings of the IPCC Second Assessment Report and the new report. However, providing access to archived web pages with outdated information would undermine EPA’s objective of providing clear and accurate information to the public, especially since archived web pages could be accessed from unintended pathways and misinterpreted by visitors. Consequently, EPA does not currently plan to adopt this recommendation of providing access to archived web pages on our global warming website. EPA will, however, continue to manage official documents such as the IPCC Third Assessment Report according to Agency records disposition schedules.
- (3) “Correct Incorrect Statement Concerning Historical Concentrations of CO₂ in the Atmosphere.” The statement was changed on August 1, 2000, to read: “Plant respiration and the decomposition of organic matter release more than 10 times the CO₂ released by human activities; but these releases have generally been in balance during the centuries leading up to the industrial revolution with carbon dioxide absorbed by terrestrial vegetation and the oceans.”

We appreciate your suggestions for improving the EPA global warming website.

Sincerely,



Robert Perciasepe
Assistant Administrator