
GLOBAL SYSTEMS ANALYSIS AND SIMULATION ASSOCIATION
IN THE U.S.A. (GLOSAS/USA)

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Environmental Protection Agency
Attention Docket ID No. EPA-HQ-OAR-2009-0171; FRL-8895-5

June 18, 2009

RE: Comment to the Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act.

Dear Administrator,

Please consider our remarks below, submitted in response to the solicitation of comments to the Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases under Section 202(a) of the clean Air Act.

PROPOSED ORGANIZING FRAMEWORK FOR DRAFTING THE GLOSAS/USA REMARKS

1. GHG Regulation Imperative
 - 1.1. Political Advocacy Group
 - 1.2. Scientific & Legal Basis
 - 1.3. National Security Implications
 - 1.4. Competitiveness
 - 1.5. Leadership Agenda
2. Specific Issues
 - 2.1. Economic Impact of GHG Regulation
 - 2.1.1. Energy cost
 - 2.1.2. Jobs
 - 2.2. Long-term social and economic benefits
 - 2.2.1. Green jobs
 - 2.2.2. End of dependence on foreign oil
 - 2.2.3. Improved human health
 - 2.2.4. Reduction of the ill effects
 - 2.2.4.1. Abrupt climate changes

- 2.2.4.1.1. Drought
- 2.2.4.1.2. Downpours and flooding
- 2.2.4.1.3. Heat waves and wildfires
- 2.2.4.1.4. Sea level rise, storms, water resources,
- 2.2.4.1.5. Agriculture, wildlife, ecosystem
- 2.2.4.2. Human health effects
- 2.2.4.3. Impact upon energy production
- 2.3. Technical Support Document
 - 2.3.1. Readable and Organized
 - 2.3.2. Prepared by IPCC (Intergovernmental Panel on Climate Change): a political advocacy group
 - 2.3.3. Junk science: inconsistent with published scientific literature
 - 2.3.4. Lacks model confidence
- 3. Our Plans
 - 3.1.1. Help draft policy of scientific integrity
 - 3.1.2. Support President's integrity intentions
 - 3.1.2.1. Recommend rigorous scientific investigation based on
 - 3.1.2.1.1. Fair and open inquiry
 - 3.1.2.1.2. Speculation avoidance
 - 3.1.2.1.3. Peer-reviewed material
 - 3.1.2.2. For scientific and legislative inputs, help provide a new set of findings based on
 - 3.1.2.2.1. Model confidence
 - 3.1.2.2.2. Initialization of the models with historical measurements
 - 3.1.2.2.3. Comparison of GHG model predictions against measured atmospheric warning data from fossil records
- 4. Conclusions: our proposed approach
 - 4.1.1. Construct globally distributed socio-economic-energy-environmental simulation system (GDSEEESS) linked to globally distributed climate simulation system (GDCSS)
 - 4.1.2. Leverage the multidisciplinary qualitative and quantitative policy analysis of global interrelations and interdependencies to influence stakeholders
 - 4.1.3. Identify and specify some /high impact pilot projects (low hanging fruits) for immediate intervention initiatives
 - 4.1.4. Involve all stakeholders in the planning process.