

- WEBINAR -

Climate Change, Governance, and the Trump Administration

Why Action Matters
More Than Ever



Agenda



Why This Issue Matters

Dr. Kyla Bennett, Director of Science Policy, PEER



Climate Policy and the Endangerment Finding

Joseph Goffman, Former Assistant Administrator, EPA Office of Air and Radiation



PEER Perspective: Why Governance Matters

Tim Whitehouse, Executive Director, PEER



EPN Perspective: Accountability and Pushing Back

Peter Murchie, Senior Director of Policy, Environmental Protection Network



Panel Discussion and Moderated Q&A

Why This Issue Matters

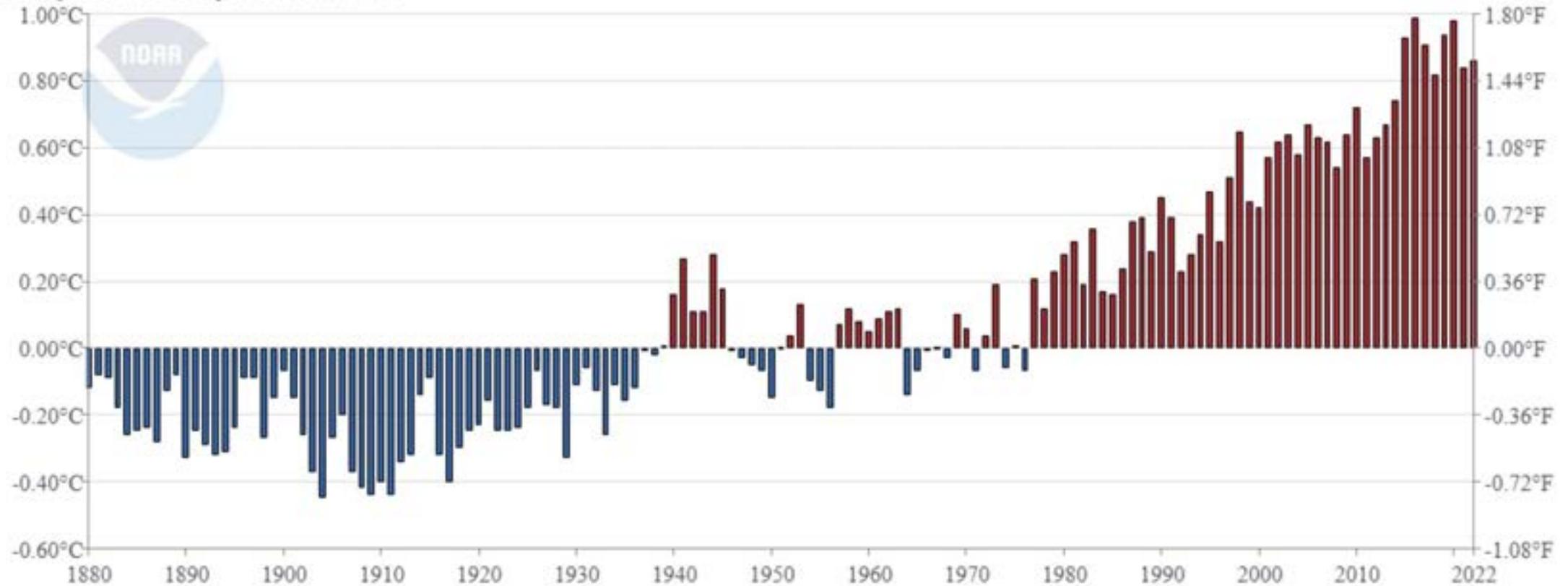


Dr. Kyla Bennett
Director of Science Policy, PEER



Climate Change: State of the Science

Global Land and Ocean
January-December Temperature Anomalies





Sea Level Rise Underestimated

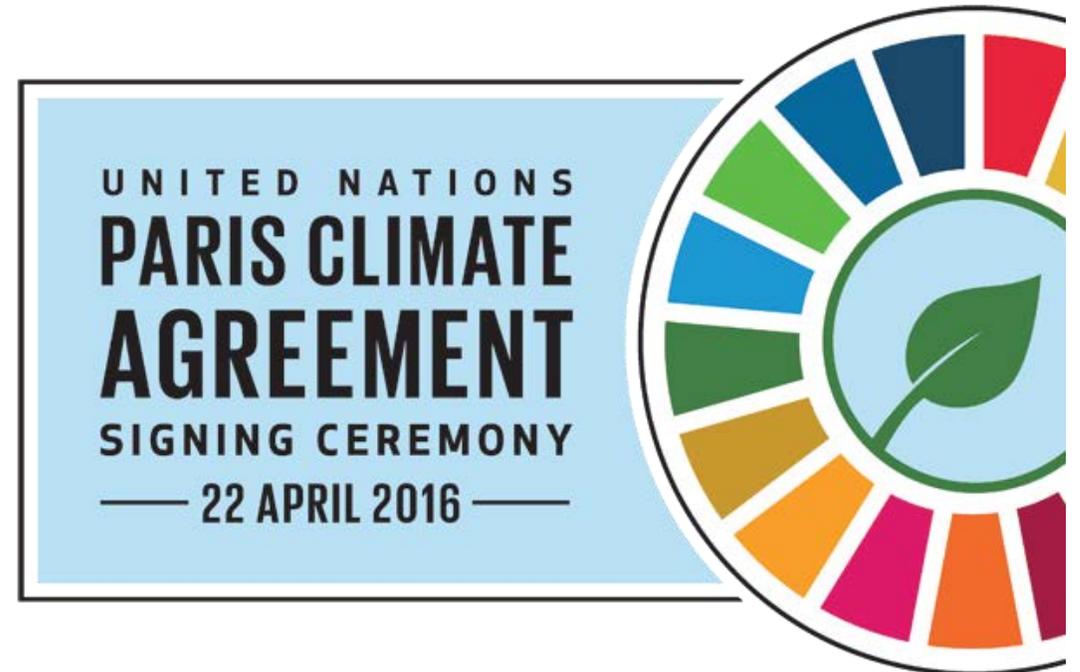
- 2026 meta-analysis showed that 99% of sea level studies used the wrong data, underestimating impacts
- 1 meter of sea-level rise = 31–37% more land and 48–68% more people falling below sea level





Rate of Warming Faster than Expected

- When influence of El Niño events, volcanic eruptions, and solar variations are removed from data, it shows a *statistically significant* acceleration of global warming since about the year 2015
- Paris Climate Accord was insufficient





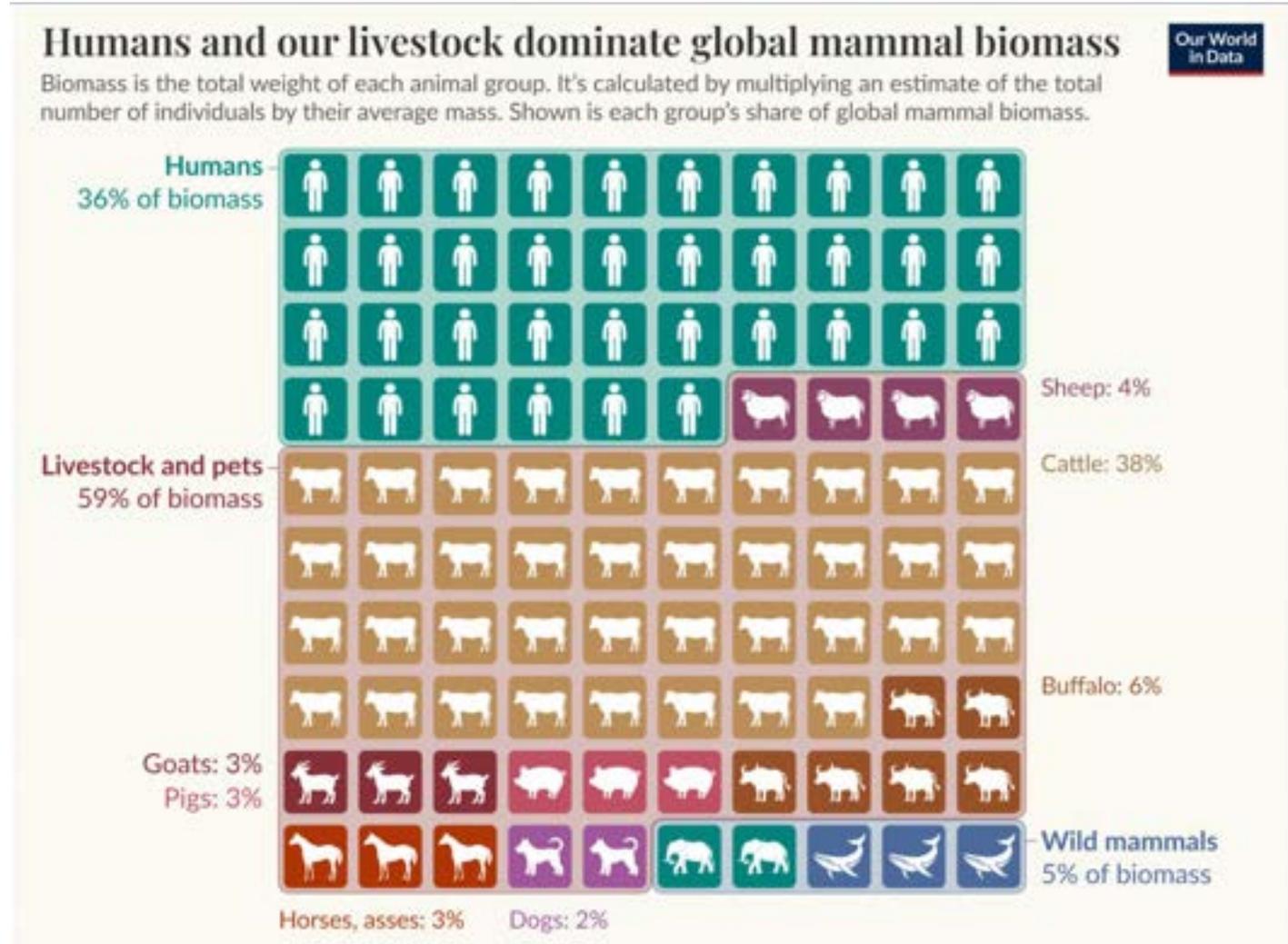
AMOC May Collapse

- 2026 research shows the Atlantic Meridional Overturning Circulation (AMOC) is weakening and is “on route to tipping”
- This would lead to abrupt climate change, including sea level rise, a mini ice-age in Europe, ecosystem collapse





Biodiversity Loss is Accelerating





Climate Change is a *Symptom* of Ecological Overreach

- Toxic chemicals
- Loss of fresh water
- Land use change and loss of intact ecosystems
- Insect apocalypse

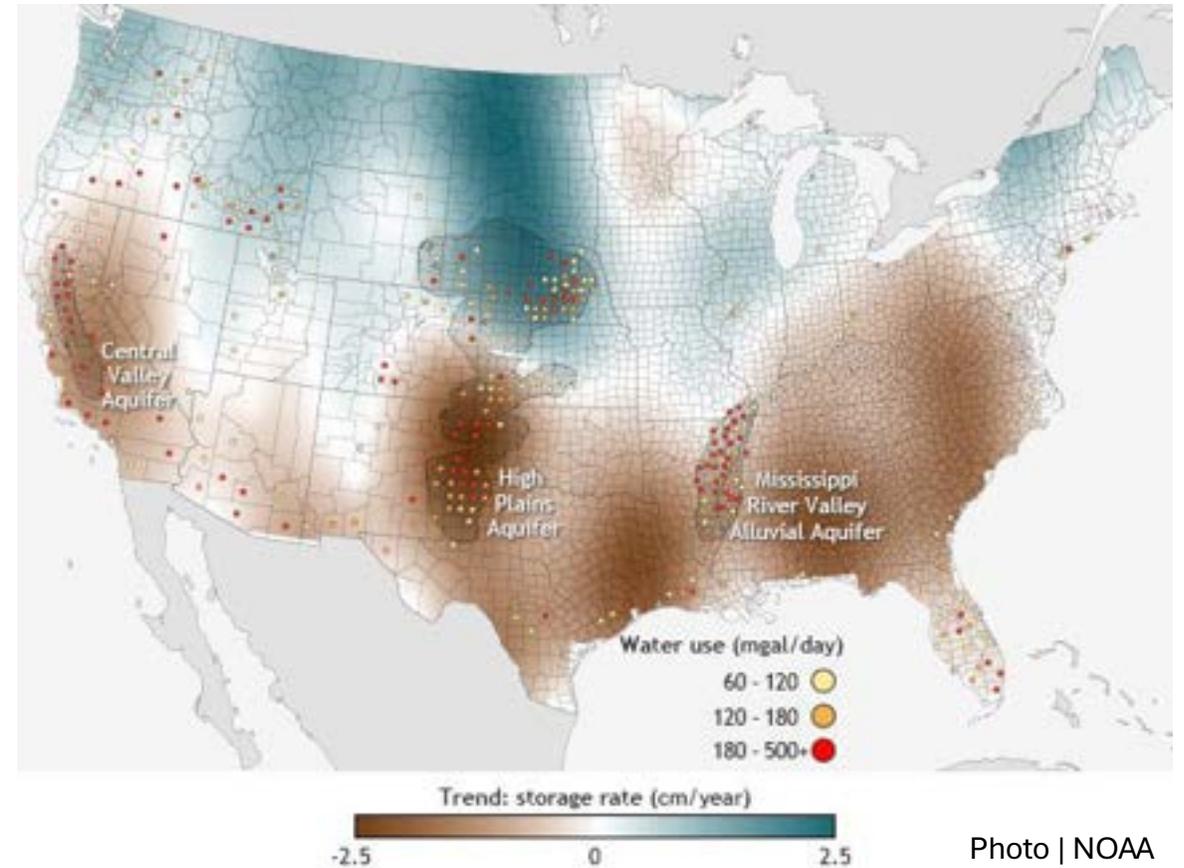


Photo | NOAA

Climate Policy and the Endangerment Finding



Joseph Goffman
Former Assistant Administrator
EPA Office of Air and Radiation

The Endangerment Finding

- What is the Endangerment Finding?
 - Brief history of the Endangerment Finding
- The EPA withdrawal of the Endangerment Finding
 - Repealed: GHG Tailpipe Emissions Standards (2024) for cars and trucks
- Impact on power sector standards and oil and gas methane standards
- Next up: DC Circuit litigation

What is the Endangerment Finding?

A final rule U.S. EPA Administrator Lisa Jackson signed in 2009, under section 202(a)(1) of the federal Clean Air Act, finding that six **greenhouse gases (GHG)** emitted by motor vehicles may “reasonably be anticipated to **endanger public health and welfare.**”



Endangerment Finding Led To...

The Endangerment Finding was the legal and factual basis for EPA's subsequent regulation of greenhouse gas emissions from **motor vehicles**, which led to **regulations for power plants, oil and gas operations and solid waste landfills.**



The Stakes – Biden Administration Climate Regulations in 2024

- March: EPA updated GHG rules for **oil and gas industry**, including existing sources
- April: EPA updated GHG standards for light, medium, and heavy-duty **vehicles**
- April: EPA issued new rules reducing GHGs from fossil fuel fired **power plants**

2024 Passenger Car GHG Emissions Standards Rule

- **7.3 billion tons of CO₂ emissions avoided** over life of program
- For average fleet: **50% reduction in CO₂ emissions** rate from MY26 fleet
- **\$13 billion in annual health benefits**, according to EPA estimates
- **\$77 billion** in estimated climate benefits
- **Consumers will save \$6,000 (pre-Iran!)** on average over the lifetime of a model year 2032 vehicle, compared to a vehicle meeting the 2026 standards



Oil/Gas Methane Standards

- Oil and natural gas well sites, compressor stations, processing segments, and transmission/storage segments
- Key **emissions sources** include completions of hydraulically fractured **wells, compressors, fugitive emissions, process controllers, process pumps, storage vessels, and sweetening units**
- The 2012 standards focused on volatile organic compounds (VOCs), while the 2016 and 2023 NSPS expanded to include methane and VOCs, with the 2023 guidelines introducing additional requirements for certain processes
- **Specific emissions controls are mandated** for various equipment, with some sources covered only for sulfur dioxide (SO₂) or VOCs
- **Leak detection and repair**
- **Super Emitter Program**



Oil and Gas Rules – Benefits

- **Methane – 30 times CO2**
- **30% of the rise in global temperature emissions since the Industrial Revolution**
- **58 million tons of methane emissions avoided from 2024 to 2038:**
 - the equivalent of **1.5 billion tons of carbon dioxide**
 - **80%** relative to what they would be without the rule
- Avoid **16 million tons of smog-forming VOCs** and **590,000 tons** of toxic air pollutants like **benzene and toluene** from 2024 to 2038
- Ozone reductions will **prevent up to 97,000 cases of asthma symptoms** and 35,000 lost school days a year
- Save enough gas from 2024 to 2038 to heat nearly 8 million homes for the winter
- **Net** climate and ozone **health benefits of \$97-\$98 billion** from 2024-2038 (in 2019 dollars), the equivalent of **\$7.3-\$7.6 billion a year**, after accounting for the costs of compliance and savings from recovered natural gas

Power Plants - New Gas and Existing Coal

New combustion turbines

- **New base load turbines:**
 - "phase one" - **efficient design and operation** of combined cycle turbines
 - "phase two" - **90% capture** of CO2 by Jan. 1, 2032
- **New intermediate load turbines** (defined as 20-40% capacity factor) - **efficient design and operation** of simple cycle turbines
- **New low load turbines** (defined as less than 20% capacity) - **low-emitting fuel**

Existing coal-fired EGUs

- **Long-term** (plan to operate post-January 1, 2039) – **Carbon Capture & Storage (CCS) with 90% capture** by January 1, 2032
- **Medium-term** (plan to cease operations by January 1, 2039) - **40% natural gas cofiring** by January 1, 2030
- **Retirement Units** (plan to cease operation by January 1, 2032) - no requirements

Power Plants – Benefits

- **1.38 billion metric tons** of carbon pollution overall through 2047
- **Up to \$370 billion in climate and public health net benefits** over the next two decades

The Stakes – Trump Administration Climate Rollbacks

- GHG rules for **oil and gas industry**, including existing sources – **ACTION PENDING?**
- GHG standards for light, medium, and heavy-duty **vehicles** – **REPEALED**
- GHGs for fossil fired **power plants** – **REPEAL PROPOSED**

“Nothing Ventured Nothing Gained” – Considerations for State and Private Actors

- State clean electricity policies
- State clean transportation policies
- Legal environment on questions of federal preemption and private causes of action rendered uncertain by repeal of Endangerment Finding and GHG tailpipe emissions standards
 - “Anti-backsliding” requirements for tailpipe emissions standards changes: electric vehicles (EVs) and NOx emissions

PEER Perspective: Why Governance Matters



Tim Whitehouse
Executive Director, PEER



About PEER

What We Are Doing

- Protecting Whistleblowers
- Shining the Light
- Improving Governance
- Building Networks

How We Work

- 12 staff
- All our work is pro bono
- Our financial support comes from foundations, individuals, and case settlements

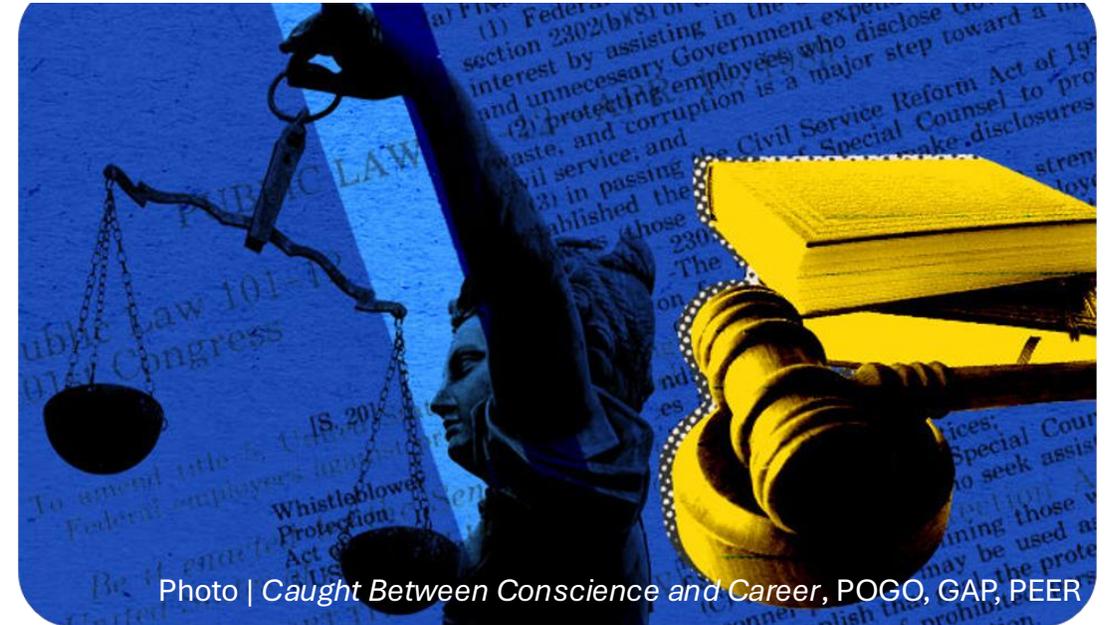


Photo | *Caught Between Conscience and Career*, POGO, GAP, PEER



Losing Our System of Governance

Governance is a critical part of any climate or environmental discussion

What is Governance?

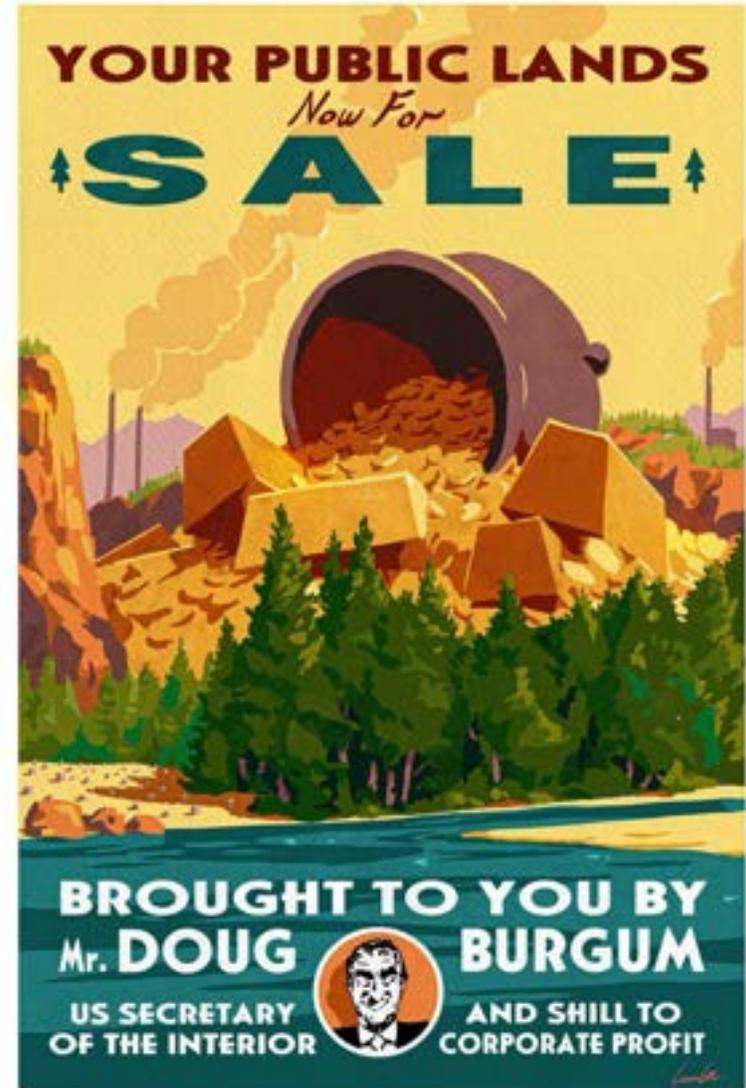
Governance refers generally to the rules, processes, institutions – rooted in our democracy, social norms, and Constitution – used to manage authority, deliver services, make decisions that matter



Governance Matters

Strong governance is critical to helping the United States address climate change

- Science, laws, policies, financing, enforcement, and nonpolitical civil service needed
- Voluntary, market-based, and personal choice aren't enough
- Public involvement and action can make a difference
 - Public push back and bi-partisan opposition has helped stall public land sales



Credit | Cormac Ganshirt



Examples of Why Governance Matters

Inside Climate News Pulitzer Prize-winning, nonpartisan news coverage of the biggest crisis facing our planet.

Justice & Health

EPA Hits 40-Year Lows in Staffing After Trump Targets Its Public Health Experts

An Inside Climate News analysis of just-released federal workforce data shows more than 4,000 employees departed between January 2025 and January 2026, including a majority of team leaders.

By Marianne Lavelle, Peter Aldhous
March 6, 2026

FOR IMMEDIATE RELEASE
Thursday, February 26, 2026
Contact:
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Tim Whitehouse, (240) 247-0299, twhitehouse@peer.org

New Investigation into Interior's Use of Taxpayer Resources for Trump-aligned Freedom 250

Diversion of Funds Raises Serious Questions

The New York Times By Maxine Joselow
Reporting from Washington

Feb. 18, 2026

As Trump Obliterates Climate Efforts, States Try to Fill the Gap

Across the country, Democratic-led states are accelerating their initiatives to cut greenhouse gas emissions. Their role just became much more important.

Listen - 8:48 min [Share full article](#) [Share](#) [Bookmark](#) [Comments 186](#)

FOR IMMEDIATE RELEASE
Monday, December 29, 2025
Contact:
Tim Whitehouse (240) 247-0299 twhitehouse@peer.org

Burgum's Offshore Wind Halt of Questionable Legality

Interior Department Riddled with Conflicts of Interest and Ethical Challenges



Returning to the Spoils System

What is the “spoils systems” and why this matters for climate change efforts

- Loyalty at odds with science
- Lack of government continuity, ability to plan
- Lack of capacity to carry out complex tasks
- More corruption

We need continuity and experts in government.

How we are fighting the spoils system

- PEER et al v. Trump et al. – Schedule Policy/Career
- PEER et al v. OMB et al. – Inspectors General





Stifling the Speech of Government Employees

Ability to speak on issues of public concern and participate in civil affairs outside of work being tested

- EPA Declaration of Dissent and Whistleblowing
- McConnell v. NLRB

Why this matters for climate change efforts

- Stamping out employees' free speech and whistleblower rights allows greater government control of public discourse
- Government is trying to reach into the private affairs of public employees



Turning the Corner Together

- Rebuilding government and climate action must go hand in hand
- Popular support for change remains strong



EPN Perspective: Accountability and Pushing Back



Peter Murchie
Senior Director of Policy
Environmental Protection Network



Environmental Protection Network

Founded in 2017, the Environmental Protection Network harnesses the expertise of more than 750 former EPA career staff and confirmation-level appointees from Democratic and Republican administrations to provide the unique perspective of former scientists and regulators with decades of historical and subject matter knowledge.

What EPN is Doing:



- **National Environmental Policy** - Building and defending the capacity of environmental agencies and the communities they serve to truly address the most urgent health and environmental crises
 - Working to ensure that EPA advances policies, budgets, and institutional changes to address environmental injustices and climate change, as well as other pressing public health needs
 - Educating Congress and serving as a critical resource for facts, objective analysis, and scientific rigor for reporters and other strategic partners
- **Technical Assistance** - Providing capacity-building technical assistance and training to frontline communities, non-profit organizations, and under-resourced state, local, and tribal government agencies including the Federal Funding Protection Initiative

What EPN is Doing:



- **Civil Service Resilience** - Providing pro bono support to civil servants
 - Programming
 - Mentoring
 - Job Board
- **Public Affairs - Save Lives / Save EPA**
 - EPN continues to work to inform and educate both national and local media utilizing our EPN volunteers and developing additional strategies to better raise awareness and tell the story of the importance of clean air and water

Why Climate Work Matters:



- **Protecting Human Health and the Environment**
 - Alaska Native Villages
- **Promoting Social/Environmental Justice**
 - Frontline communities
- **Ensuring Food/Water Security**
 - Data centers
 - Crop/water insecurities
- **Global Leadership and Science**
 - Shuttering of EPA's Office of Research and Development and other federal science capabilities

Resources

PEER Perspective: Why Governance Matters

- PEER et al v. Trump et al. – Schedule Policy/Career – <https://peer.org/public-service-organizations-unions-file-legal-challenge-trump-vance-schedule-pc/>
- PEER et al v. OMB et al. – Inspectors General – <https://peer.org/lawsuit-filed-protect-oversight-watchdogs-trump-vance-administration/>
- EPA Declaration of Dissent and Whistleblowing – <https://peer.org/newly-released-epa-documents-support-employees-free-speech-rights/>
- McConnell v. NLRB – <https://peer.org/federal-employee-first-amendment-lawsuit-advances/>
- <https://peer.org/federal-employee-first-amendment-lawsuit-advances/>

APPENDIX – Climate Policy and the Endangerment Finding

Additional Background Slides

Legal Basis for Endangerment Finding Rescission

- EPA does not have legal authority to find endangerment from GHGs under § 202(a)(1):
 - the Clean Air Act's reference to “air pollution” extends only to pollution with local or regional effects
 - new motor vehicles do not contribute to such localized air pollution because climate change harms are too attenuated from US vehicle GHG emissions
 - regulating these emissions would not meaningfully address the underlying harm
 - EPA should have addressed the air pollutants individually

Power Plants - New Gas and Existing Coal

New combustion turbines

- New base load turbines (defined as units that are generating at least 40% of their maximum annual capacity, i.e., greater than 40% capacity factor) are subject to an initial "phase one" standard based on efficient design and operation of combined cycle turbines; and a "phase two" standard based on 90% capture of CO₂ with a compliance deadline of Jan. 1, 2032.
- New intermediate load turbines (defined as units that are generating between 20 and 40% of their maximum annual capacity, i.e., 20-40% capacity factor) are subject to a standard based on efficient design and operation of simple cycle turbines.
- New low load turbines (defined as units that are generating less than 20% of their maximum annual capacity, i.e., less than 20% capacity factor) are subject to a standard based on low-emitting fuel.

Existing coal-fired EGUs

- Units that intend to operate on or after January 1, 2039 (i.e., "long-term" units) will have a numeric emission rate limit based on application of CCS with 90% capture, which they must meet on January 1, 2032.
- Units that have committed to cease operations by January 1, 2039 (i.e., "medium-term" units) will have a numeric emission rate limit based on 40% natural gas cofiring that they must meet on January 1, 2030.
- Units that demonstrate that they plan to permanently cease operation prior to January 1, 2032, will have no emission reduction obligations under the rule.

“Fleet Mix” – How might companies comply?

- Performance-based GHG Standards
 - Allow companies considerable flexibility to address diverse business and marketing requirements
 - Encourage consumer choice
- Projections:
 - EVs: 30% to 56% for light-duty vehicles / 20% to 32% for medium-duty vehicles
 - ICEs: 29%
 - PHEVs: 13%
 - HEVs: 3%
- Particulate Filter Projections:
 - 100% implementation in internal combustion vehicles

Oil and Gas – Potential Changes

- Modest reconsideration proposal by Biden EPA to make targeted adjustments
 - Final in OMB review
- Interim Final Rule to extend compliance deadlines
- Legal and political cross-pressures
 - 2020 repeal of Obama methane standards nullified by Congress in 2021, including via legislative history, the arguments made to support repeal
 - Major international companies favor preserving methane standards to ensure global competitiveness

Power Plants – Potential Changes

- Proposed Full Repeal in June 2025
 - Arguments similar to repeal of car and truck standards: GHG emissions not sufficient to be “significant” contributors to global climate change per EPA interpretation of Clean Air Act section 111
- Industry Legal Risk Aversion
 - Industry wants requirements (CCS and co-firing) repealed via the least risky legal path – i.e. based on the technical record without relying on statutory interpretation

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