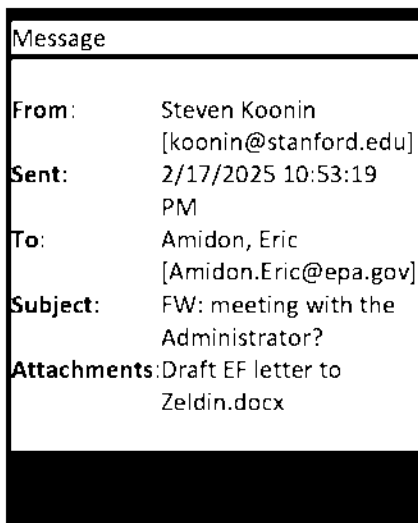


# Exhibit L



**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Attached is a draft of a letter to the Administrator prepared by a group of scientists and lawyers expert in matters related to the Endangerment finding.

Happy to elaborate on a call.

Steve Koonin

**From:** Steven Koonin  
**Sent:** Sunday, February 16, 2025 3:27 PM  
**To:** Eric Amidon <Amidon.Eric@epa.gov>  
**Subject:** Re: meeting with the Administrator?

I could do a call Tuesday 0900 or anytime after 1300.

I'll send you a brief document tomorrow summarizing important points.

Steven E. Koonin  
Senior Fellow  
Hoover Institution  
Stanford University

On Feb 16, 2025, at 15:05, Amidon, Eric <Amidon.Eric@epa.gov> wrote:

We are moving right along on this topic. Would you be available to jump on a call tomorrow or Tuesday? I would have a few people from the team working on the call who are working on this. We might have to be mostly in listening mode, but would love any insight you could provide.

**Eric Amidon**  
Chief of Staff  
Environmental Protection Agency

**From:** Steven Koonin <koonin@stanford.edu>  
**Sent:** Thursday, February 13, 2025 4:29 PM  
**To:** Amidon, Eric <Amidon.Eric@epa.gov>  
**Subject:** meeting with the Administrator?

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Eric-

I was told (through a mutual friend of mine and the Administrator's) that I should contact you to set up a meeting with Mr. Zeldin.

The subject is to offer technical assistance from me and colleagues in the review of the Endangerment Finding.

A bit about me can be found at <https://www.hoover.org/profiles/steven-koonin>.

I can be reached by return email or at Ex. 6 Personal Privacy (PP)

Steve Koonin

February XX, 2025

The Honorable Lee Zeldin  
Administrator  
U.S. Environmental Protection Agency  
Washington DC 20460

Dear Administrator Zeldin,

In light of President Trump's Executive Order "Unleashing American Energy" (January 20, 2025), we hereby encourage, support and petition you to commence a rulemaking to review and reverse the Administrator's findings as set forth in, "Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act," Final Rule, 74 FR 66496 (December 15, 2009), as well as subsequent related findings based on the same scientific analysis ("Endangerment Findings").

The statutory issue to be considered is whether there is sufficient evidence to enable you as the Administrator to form a judgment that emissions of greenhouse gases pose a danger to public health and welfare of current and future generations. To justify reaffirmation of the Endangerment Findings, there would need to be convincing empirical evidence validating the hypothesis of such impending danger. However, it is the opposite: Since 2009, accumulating scientific work and observational evidence have invalidated the scientific basis of the Endangerment Findings, and have failed to support the hypothesis that anthropogenic greenhouse gases, including CO<sub>2</sub>, have caused or might cause dangerous changes in the climate. It is therefore scientifically unjustified to find that human emissions of greenhouse gases including CO<sub>2</sub> will cause danger to human health and the public welfare.

Below are some of the key conclusions to be drawn from decades of extensive research, most of it subsequent to 2009

- **The asserted scientific bases for the 2009 Endangerment Findings have been completely invalidated.** The Technical Support Document for the Endangerment Findings stated that they were based on three scientific "lines of evidence" (74 FR at 66518) Those three were: a claimed "basic physical understanding" of how the climate system would respond to "changing concentrations of greenhouse gases"; measured "changes in global surface temperature"; and the "use of computer-based climate models." Each of the three has been conclusively invalidated.
- **The majority of the emission-driven climate models on which EPA relied for the Endangerment Findings have been invalidated.** EPA relied on climate models that assumed without proof that CO<sub>2</sub> and other greenhouse gases were the exclusive climate control knobs. The models uniformly over-predicted how much atmospheric temperatures would increase over the ensuing years, and subsequently there has been no explanation offered for the discrepancy. It has thus been demonstrated that the

models do not reflect an accurate understanding of the climate system, and they are not useable for any policy purpose.

- **The quality and temporal coverage of the temperature records relied on by EPA are inadequate.** Surface temperature records (which were also relied on by EPA as one of the bases for the Endangerment Findings) are notoriously inadequate in their data quality and their spatial and temporal coverage. Apart from gross quality defects from contamination by the urban heat island effect and rampant invalid adjustments and manipulations, there is a total absence of data for vast portions of the earth's surface for substantial portions of the instrumental record. These well-known shortcomings preclude use of these records for development of an empirically validated theory greenhouse gas warming, and in turn preclude proper calibration of climate models. The data are inadequate to support attribution of warming to human emissions.
- **Empirical evidence fails to support any link between warming to date and any increase in extreme weather events.** Empirical evidence gathered to date in hundreds of studies show no significant relationship between warming and the great majority of extreme weather events, whether they be hurricanes, tornadoes, floods, droughts or wildfires. Therefore, it is not possible to place blame for any such events, and any "danger" to human health or welfare from such events, upon emissions-driven warming supposedly causing the events. Without a proven causal link between historical extremes and temperatures, there can be no basis for assuming such a link in the future.
- **Reported decadal-scale changes in temperature can be entirely explained by factors other than emissions.** Changes in "average global temperature" (a questionable metric to begin with) can be readily explained by myriad natural and manmade factors, including the ENSO cycle, solar variation, cloud and aerosol variations, volcanic eruptions, the urban heat island effect and other factors. These factors are either unaccounted for, or are inadequately incorporated into climate models, which explains why the models don't work. Recent temperature changes are well within the range of natural variability. Since changes to date in "average global temperature" cannot be demonstrated to be unusual or out of the range of natural variability, it is not possible to conclude that human emissions will cause future increases in any dangerous amount.
- **There is no basis to conclude that human emissions enhance natural 'greenhouse' warming in any dangerous amount.** Warming by a large increase of CO<sub>2</sub> is limited by a law of diminishing returns. This has been accepted science for more than a century. This completely undermines any attempt to claim that human emissions can cause dangerous climate change.

These "inconvenient truths" are based upon the actual data, or lack thereof. Reversing the Endangerment Findings would be merely an exercise in applying the actual extant science to the required legal standard.

While the assertion of some potential danger from human greenhouse gas emissions is wholly speculative and unproven, it is completely clear that the attempt through EPA and other regulations to reduce greenhouse gas emissions through suppression of hydrocarbon fuels poses enormous and non-speculative dangers to human health and welfare. As one notable example, EPA's efforts pursuant to the Endangerment Findings to restrict and end use of hydrocarbon fuels in power plants (cite) is leading to electrical grids increasingly powered by intermittent wind and sun generation, which cannot provide the reliable electricity society demands. Such changes undermine large amounts of life-saving medical and hospital care. Efforts to force conversion of residential buildings to electric heat, with the electricity coming from an unreliable wind/solar grid, threaten people with heat interruptions in the dead of winter, which can cause deaths. Efforts to use batteries to transform intermittent generation into reliable electricity have led to large battery farms that have recently experienced massive explosions and fires, with release of highly toxic hydrogen fluoride gas, forcing widespread evacuations as in California's Moss Landing in January 2025. These results of limitations on hydrocarbon fuels pose real and immediate, not speculative, dangers to human health and welfare.

Finally, we remind you of several more realities. Carbon dioxide emissions are colorless, odorless and are vital plant food. NASA satellite data report an increase in the greening of the Earth during the satellite era. CO<sub>2</sub> emissions are credited, in part, for that.

Hydrocarbon fuels, with their inherent accompanying emissions, have made modern society the wealthiest, healthiest and freest in the history of mankind. Since the pre-industrial era, emissions have helped take humanity from less than one billion in population to more than eight billion. The heavy burden to show that emissions harm public health and public welfare lies squarely on the proponents of such claims. Yet they have failed to meet that burden after decades and hundreds of billions of dollars of research. We urge you to get the process for reversing the Endangerment Finding underway as soon as possible.

Sincerely,