



OFFICE OF CLEAN AIR PROGRAMS

WASHINGTON, D.C. 20460

April 23, 2026

Austin Lipari and Michael Buschbacher
Boyden PLLC
800 Connecticut Avenue NW, Suite 900
Washington, D.C. 20006

Re: Request for Correction: Technical Documentation for the Framework for Evaluating Damages and Impacts (FrEDI) (RFC 25001)

Dear Mr. Buschbacher and Mr. Lipari:

This letter is in response to the Request for Correction ([RFC #25001](#)) received by the U.S. Environmental Protection Agency (EPA) on June 27, 2025, pursuant to *EPA's Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the EPA*, also called the Information Quality Guidelines. In the RFC, the Center for Environmental Accountability seeks the correction of information within the Framework for Evaluating Damages and Impacts (FrEDI).

This Administration is committed to prioritizing EPA's core statutory mission and ensuring that all regulatory actions are clearly grounded in statutory authority and the best reading of the law. We are also committed to evaluating and taking prompt action on concerns raised about the scientific underpinnings of Agency tools and analyses that may obscure uncertainty, mislead the public, or be contradicted by empirical data, peer-reviewed studies and more recent scientific developments.

In the RFC, the Center raises important questions about the FrEDI tool, including the emissions scenarios used to calibrate damage functions in the tool. For example, the Center points out that the assumptions underlying Representative Concentration Pathway 8.5 (or RCP8.5) "are not merely unlikely—they are flawed, implausible, and outdated". The RCP8.5 emissions scenario is a high emissions scenario representing a future with little to no policies to reduce global greenhouse gas emissions. Consistent with President Trump's Executive Order 14303 [*Restoring Gold Standard Science*], EPA agrees that RCP8.5 is an implausible scenario for representing conditions likely to be seen this century. In fact, Agency analysis has found that there was only a 0.5% chance of exceeding 8.5 Wm⁻² of radiative forcing in the year 2100¹.

In December 2025, EPA made changes to select Agency webpages as part of a broader effort to better align with current Administration priorities. As part of these changes, EPA removed the webpage

¹ Sarofim, et al., High radiative forcing climate scenario relevance analyzed with a ten-million-member ensemble. *Nature Communications*, 2024, doi: [10.1038/s41467-024-52437-9](https://doi.org/10.1038/s41467-024-52437-9)

disseminating the FrEDI model and technical documentation. As the Agency is no longer disseminating the FrEDI model and is not relying on it to formulate or support regulations, the Agency considers this RFC to be closed.

Should you have questions or need additional information about the EPA's Information Quality Guidelines process, you may contact us via email to quality@epa.gov (our preferred method), or via regular mail to the EPA Data and Enterprise Programs Division, Mail Code 2831T, U.S. EPA, 1200 Pennsylvania Avenue, NW, Washington, DC 20460.

Sincerely,

Panagiotis Tsigotis, Director
Office of Clean Air Programs
U.S. Environmental Protection Agency

cc: Carter Farmer, Chief Information Officer
Jenia McBrian, Chief Quality Officer, Data and Quality Branch, Data and Enterprise Programs Division, Office of Finance and Administration