



***Reducing Black Carbon May Be the Fastest Strategy
for Slowing Climate Change***

**IGSD/INECE Climate Briefing Note
June 2009**

Black Carbon Is a Potent Climate-Forcing Agent and an Essential Target for Climate Mitigation

Black carbon (BC), a component of soot, is a potent climate-forcing agent and has been estimated to be the second or third strongest contributor to global warming after carbon dioxide (CO₂).¹ Therefore, addressing BC emissions is an essential element of any comprehensive climate change mitigation strategy. Moreover, because BC particles remain in the atmosphere only for a few days or weeks, reducing BC emissions may be the fastest means of slowing climate change in the near term.²

Addressing BC now can help forestall the passing of thresholds, or tipping points,³ for abrupt and irreversible climate changes,⁴ which scientists warn could be less than ten years away and could have catastrophic impacts.⁵ Reducing BC may also help make up for time already lost in not addressing CO₂ emissions quickly enough. Because of the potential speed of mitigation from BC reductions, such efforts offer great promise for those nations already suffering from the adverse impacts of climate change, since reducing CO₂, though critical, will not actually bring about significant cooling for many decades.

In addition to its aggregate global effect, BC has particularly strong regional effects. These include harmful impacts to some of the regions most imminently threatened by climate change. For example, in the Himalayas, the impact of BC on melting snowpack and glaciers may be equal to that of CO₂.⁶ This melting contributes to sea-level rise and presents a serious threat to critical water supplies. BC's contribution to dangerous Arctic ice-melt is also especially severe. A recent study notes that BC is responsible for 50% of the Arctic's 1.9°C warming since 1890, and an even higher percentage since the 1970s.⁷

Since 1950, many countries have greatly reduced BC emissions, especially from fossil fuel sources, primarily to improve public health. Thus, technologies are available now to reduce BC. Many more are in development. These technologies will offer significant public health and climate co-benefits worldwide. Ensuring compliance and enforcement with existing national laws that address particle emissions can provide some relief, but new laws and new means of cooperation as well as new funding sources are needed at all levels for faster reductions of this powerful warming agent.

Black Carbon and its Climate Effects

Black carbon is the strongly absorbing component of carbonaceous aerosols which gives soot its dark color.⁸ BC is formed through the incomplete combustion of fossil fuels, biofuel, and biomass, and is a component of both anthropogenic and naturally occurring soot. Airborne BC particles warm the planet by absorbing solar radiation and releasing it as heat into the atmosphere. Unlike CO₂, which has an atmospheric lifetime of more than 100 years⁹, BC descends from the atmosphere after several days or

weeks. As it descends BC can be deposited on snow and ice surfaces, which it darkens. This darkening reduces albedo, the reflection of sunlight, leading to more warming and accelerating melting.

In its 2007 report, the IPCC estimated the direct radiative forcing of black carbon to be + 0.34 W/m². It calculated the direct forcing from fossil fuel emissions to be + 0.22 W/m² and the direct forcing from biomass and other emissions to be + 0.12 W/m². In addition, the IPCC estimated the radiative forcing of black carbon through its indirect effect on the surface albedo of snow and ice to be + 0.1 W/m². Thus, the total forcing from BC, according to the IPCC, is approximately + 0.44 W/m².¹⁰

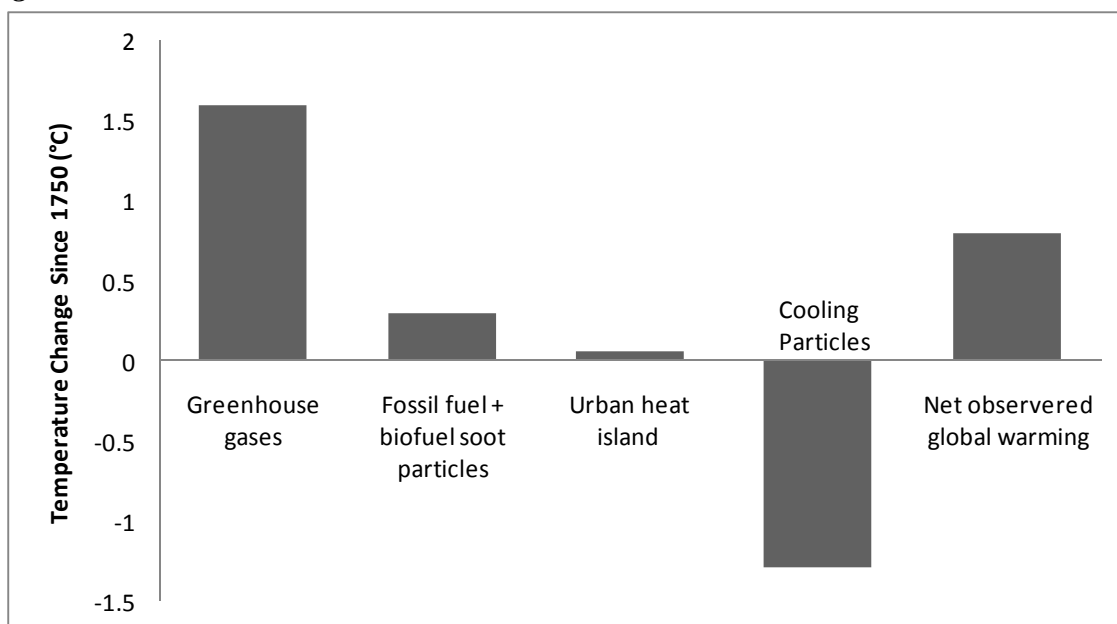
Separate studies and public testimony by many of the same scientists cited in the IPCC's report indicate that BC's warming effects are much stronger. For example, Dr. V. Ramanathan and Dr. G. Carmichael claim "emissions of black carbon are the second strongest contribution to current global warming, after carbon dioxide emissions."¹¹ They calculate BC's direct climate forcing at + 0.9 W/m², which "is as much as 55% of the CO₂ forcing and is larger than the forcing due to the other GHGs such as CH₄, CFCs, N₂O or tropospheric ozone."¹² Other scientists estimate BC's direct forcing between 0.2 to 0.6 W/m² with varying ranges due to uncertainties, but with the higher values tending to come in the most recent assessments (see Table 1). For comparison, the IPCC calculates the climate forcing of carbon dioxide and methane to be + 1.66 W/m² and + 0.48 W/m², respectively¹³ (see Table 2). Thus, BC is likely the second or third strongest climate forcer globally. Moreover, as discussed below, BC is especially potent at the regional level and has particularly harmful effects in some of the most threatened regions worldwide.

According to Dr. Mark Jacobson of Stanford University, control of BC, "particularly from fossil-fuel sources, is very likely to be the fastest method of slowing global warming" in the immediate future.¹⁴ BC's potential for rapid climate mitigation derives from its short atmospheric lifetime. Because it only remains in the atmosphere for a few days to weeks, reducing emissions would have a mitigating impact in a comparable period. Jacobson believes that major cuts in BC emissions could slow the effects of climate change for a decade or two.¹⁵ Reducing BC emissions could also help keep the climate system from passing tipping points for abrupt climate changes, including significant sea-level rise from the disintegration of the Greenland and/or Antarctic ice sheets.¹⁶

Jacobson also calculates that reducing fossil fuel and biofuel soot particles would eliminate about 40% of net observed global warming.¹⁷ (See Figure 1). In addition to BC, fossil fuel and biofuel soot contain aerosols and particulate matter that cool the planet by reflecting the sun's radiation away from the Earth.¹⁸ Including the cooling effects of some aerosols and particulate matter co-emitted with BC, fossil fuel and biofuel soot are still increasing temperatures by about 0.35°C.¹⁹ Jacobson notes that BC could have a 20-year Global Warming Potential (GWP) as high as 4,470, and a 100-year GWP of 1,055-2,240.²⁰ As a mixture of BC and other aerosols, some of which have a cooling effect, fossil fuel soot as a whole has a 20-year GWP of 2,530, and a 100-year GWP of 840-1,280.²¹

Over the course of the century, however, the amount of these cooling aerosols in the atmosphere is expected to decrease, largely as a result of reductions in sulfur dioxide emissions for public health reasons. These sulfur reductions will unmask warming by other agents, such as BC, which these cooling particles currently help to offset. At the same time, BC emissions are expected to double under the IPCC's A1B scenario, increasing their warming effect.²² Thus, addressing BC is critical both to prevent additional warming by increased BC emissions, and to keep pace with expected reductions in other particles that cause cooling.²³

*Figure 1*²⁴



Primary contributions to observed global warming, from 1750 to the present from global model calculations. The fossil-fuel plus biofuel soot estimate takes into account the effect of soot on snow and ice albedo as well as cooling particles and particulate matter emitted with BC.

BC Is Accelerating the Melting of Arctic Sea-Ice and Himalayan Glaciers

BC is a significant contributor to Arctic ice-melt, responsible for 50% of the Arctic's 1.9°C warming since 1890, and an even higher percentage since the 1970s.²⁵ Thus, according to Dr. Charles Zender of the University of California, Irvine, reducing such emissions may be “the most efficient way to mitigate Arctic warming that we know of.”²⁶ BC's Arctic impact is critical, Zender notes, because “nothing in climate is more aptly described as a ‘tipping point’ than the 0° C boundary that separates frozen from liquid water—the bright, reflective snow and ice from the dark, heat-absorbing ocean.”²⁷ Indeed, the irreversible melting of Arctic sea-ice is widely considered the most sensitive tipping point we face.

According to NASA scientists Dr. James Hansen and Dr. Larissa Nazarenko, BC's “climate forcing due to snow/ice albedo change is of the order of 1.0 W/m² at middle- and high-latitude land areas in the Northern Hemisphere and over the Arctic Ocean.”²⁸ Moreover, the “soot effect on snow albedo may be responsible for a quarter of observed global warming.”²⁹ “Soot deposition,” Hansen and Nazarenko explain, “increases surface melt on ice masses, and the meltwater spurs multiple radiative and dynamical feedback processes that accelerate ice disintegration.”³⁰ As a result of this feedback process, “BC on snow warms the planet about three times more than an equal forcing of CO₂.”³¹ When BC concentrations in the Arctic increase during the winter and spring due to Arctic Haze, surface temperatures increase by 0.5°C.³²

BC emissions from northern Eurasia, North America, and Asia have the greatest absolute impact on Arctic warming.³³ However, BC emissions originating from the Arctic have a disproportionately large impact on Arctic warming compared to emissions originating elsewhere.³⁴ As more Arctic ice melts and shipping activity increases, emissions originating within the Arctic are expected to rise.³⁵

In the Himalayas and Tibetan Plateau, the impact of BC on melting snowpack and glaciers may be equal to that of CO₂.³⁶ Warmer air resulting from the presence of BC in South and East Asia over the Himalayas contributes to a warming of approximately 0.6°C.³⁷ An “analysis of temperature trends on the Tibetan side of the Himalayas reveals warming in excess of 1°C since the 1950s.”³⁸ This large warming trend is the proposed causal factor for the accelerating retreat of Himalayan glaciers,³⁹ which threatens fresh water supplies and food security in China and India.⁴⁰

Major Producers of BC

By Region: Developed countries were once the primary source of BC emissions, but this began to change in the 1950’s with the adoption of pollution control technologies in those countries.⁴¹ Whereas the U.S. emits about 21% of the world’s CO₂, it emits 6.1% of the world’s soot.⁴² The United States and the European Union could further reduce their BC emissions by accelerating implementation of particulate regulations that currently take effect in 2015 or 2020, and by expanding emissions requirements that cover only new vehicles to cover vehicles already in use.⁴³ This is especially important because diesel vehicles often remain in use for 30-40 years.

Today, the majority of BC emissions are from developing countries⁴⁴ and this proportion is expected to increase.⁴⁵ The largest sources of BC are Asia, Latin America, and Africa.⁴⁶ China and India account for 25-35% of global BC emissions.⁴⁷ BC emissions from China doubled from 2000 to 2006.⁴⁸ Existing and well-tested technologies used by developed countries, such as clean diesel and clean coal, could be transferred to developing countries to reduce their emissions.⁴⁹

BC emissions “peak close to major source regions and give rise to regional hotspots of BC-induced atmospheric solar heating.”⁵⁰ Such hotspots include, “the Indo-Gangetic plains in South Asia; eastern China; most of Southeast Asia including Indonesia; regions of Africa between sub-Sahara and South Africa; Mexico and Central America; and most of Brazil and Peru in South America.”⁵¹ Approximately three billion people live in these hotspots.⁵²

By Source: Approximately 20% of BC is emitted from burning biofuels, 40% from fossil fuels, and 40% from open biomass burning, according to Ramanathan.⁵³ Similarly, Dr. Tami Bond of the University of Illinois, Urbana Champaign, estimates the sources of BC emissions as follows:

42%	Open biomass burning (forest and savanna burning)
18%	Residential biofuel burned with traditional technologies
14%	Diesel engines for transportation
10%	Diesel engines for industrial use
10%	Industrial processes and power generation, usually from smaller boilers
6.0%	Residential coal burned with traditional technologies. ⁵⁴

BC sources vary by region. For example, the majority of soot emissions in South Asia are due to biofuel cooking and heating, whereas in East Asia, coal combustion for residential and industrial uses plays a significant role along with biofuel combustion.

Fossil fuel and biofuel soot contain significantly greater amounts of BC than climate-cooling aerosols and particulate matter, making emissions reductions from these sources particularly effective mitigation strategies. For example, emissions from diesel engines contain higher proportions of BC than other

sources.⁵⁵ Regulating BC emissions from diesel engines therefore presents a particularly effective opportunity to reduce BC's global warming impact.⁵⁶

Biomass burning tends to emit greater amounts of climate-cooling aerosols than BC, resulting in short-term cooling. However, over the long-term, biomass burning may cause a net warming when CO₂ emissions and deforestation are considered.⁵⁷ Reducing biomass emissions could therefore reduce global warming in the long-term and provide co-benefits of reduced air pollution, CO₂ emissions, and deforestation.

By Season: The magnitude of the forcing and temperature response to black carbon can be a function of season, particularly in the Arctic, where BC's climate impact is controlled by transport, sunlight, snow/ice melt, and deposition. In winter and early spring, the combination of efficient transport of pollutants from the mid-latitudes to the Arctic and limited atmospheric removal of these pollutants results in higher atmospheric concentrations.⁵⁸ There can also be elevated concentrations in the summertime, when boreal forest fire emissions reach the Arctic.⁵⁹

As noted above, the deposition of BC onto highly reflective snow/ice surfaces lowers the surface reflectivity and yields a positive surface forcing. The forcing of greatest concern occurs in early spring, when the onset of ice sheet melt can be dangerously accelerated.⁶⁰

Technology for Reducing BC Is Available

Ramanathan notes that “developed nations have reduced their BC emissions from fossil fuel sources by a factor of 5 or more since 1950. Thus, the technology exists for a drastic reduction of fossil fuel related BC.”⁶¹

Jacobson believes that “[g]iven proper conditions and incentives, [soot] polluting technologies can be quickly phased out. In some small-scale applications (such as domestic cooking in developing countries), health and convenience will drive such a transition when affordable, reliable alternatives are available. For other sources, such as vehicles or coal boilers, regulatory approaches may be required to nudge either the transition to existing technology or the development of new technology.”⁶²

Hansen states that “technology is within reach that could greatly reduce soot, restoring snow albedo to near pristine values, while having multiple other benefits for climate, human health, agricultural productivity, and environmental aesthetics. Already soot emissions from coal are decreasing in many regions with transition from small users to power plants with scrubbers.”⁶³

Jacobson suggests converting “[U.S.] vehicles from fossil fuel to electric, plug-in-hybrid, or hydrogen fuel cell vehicles, where the electricity or hydrogen is produced by a renewable energy source, such as wind, solar, geothermal, hydroelectric, wave, or tidal power. Such a conversion would eliminate 160 Gt/yr. (24%) of U.S. (or 1.5% of world) fossil-fuel soot and about 26% of U.S. (or 5.5% of world) carbon dioxide.”⁶⁴ According to Jacobson's estimates, this proposal would reduce soot and CO₂ emissions by 1.63 Gt CO₂-eq. per year.⁶⁵ He notes, however, “that the elimination of hydrocarbons and nitrogen oxides would also eliminate some cooling particles, reducing the net benefit by at most, half, but improving human health,” a substantial reduction for one policy in one country.⁶⁶

For diesel vehicles in particular there are several effective technologies available. Diesel oxidation catalysts (DOCs) have been in use for over 30 years, can be used on almost any diesel vehicle, and can

eliminate 25-50% of overall particulate emissions.⁶⁷ Newer, more efficient diesel particulate filters (DPFs) can eliminate over 90% of black carbon emissions,⁶⁸ but these devices require ultra-low sulfur diesel fuel (ULSD). To ensure compliance with new particulate rules for new on-road and non-road vehicles in the U.S., the EPA first required a nationwide shift to ULSD, which allowed DPFs to be used in diesel vehicles in order to meet the standards.

Because of recent EPA regulations, BC emissions from diesel vehicles in the U.S. are expected to decline about 70% from 2001 to 2020.⁶⁹ Overall, “BC emissions in the United States are projected to decline by 42 percent from 2001 to 2020.”⁷⁰ By the time the full fleet is subject to these rules, EPA estimates that over 239,000 tons of particulate matter will be reduced annually.⁷¹ Outside of the US diesel oxidation catalysts are often available and DPFs will become available as ULSD is more widely commercialized. In addition, a newer type of filter, known as partial, or flow-through, filters, does not trap particles but instead oxidizes them using a tortuous flow path with catalysts.⁷² These filters are becoming more popular as they do not require ultra-low sulfur diesel fuel and can eliminate 40-70% of particulates.⁷³

Another technology for reducing BC emissions from diesel engines is to shift fuels to compressed natural gas. In New Delhi, India, a court-ordered shift to compressed natural gas for all public transport vehicles, including buses, taxis, and rickshaws, resulted in a climate benefit, “largely because of the dramatic reduction of black carbon emissions from the diesel bus engines.”⁷⁴ Overall, the fuel switch for the vehicles reduced black carbon emissions enough to produce a 10 percent net reduction in CO₂-eq., and perhaps as much as 30 percent.⁷⁵ The main gains were from diesel bus engines from which CO₂-eq. emissions were reduced 20 percent.⁷⁶ According to a study examining these emissions reductions, “there is a significant potential for emissions reductions through the [UNFCCC] Clean Development Mechanism for such fuel switching projects.”⁷⁷

Technologies are also in development to reduce some of the 133,000 metric tons of particulate matter emitted each year from ships.⁷⁸ Ocean vessels use diesel engines, and particulate filters similar to those in use for land vehicles are now being tested. As with current particulate filters these too would require the ships to use ULSD, but if comparable emissions reductions are attainable, up to 120,000 metric tons of particulate emissions could be eliminated each year from international shipping.⁷⁹ Other efforts can reduce the amount of BC emissions from ships simply by decreasing the amount of fuel the ships use. By traveling at slower speeds or by using shore-side electricity when at port instead of running the ship’s diesel engines for electric power, ships can save fuel and reduce emissions.

Ramanathan estimates that “providing alternative energy-efficient and smoke-free cookers and introducing transferring technology for reducing soot emissions from coal combustion in small industries could have major impacts on the radiative forcing due to soot.”⁸⁰ Specifically, the impact of replacing biofuel cooking with BC-free cookers (solar, bio, and natural gas) in South and East Asia is dramatic: over South Asia, a 70 to 80% reduction in BC heating; and in East Asia, a 20 to 40% reduction.⁸¹

Reduced BC Provides Strong Co-Benefits for Public Health and Food Security

Reducing BC emissions provides strong co-benefits for public health, with the potential to save up to three million lives a year that otherwise would be lost to air pollution (both indoor and outdoor).⁸² It also provides significant co-benefits to agriculture, by reducing BC’s damaging impact on plants, thereby improving crop productivity.⁸³

New and Stronger Efforts Are Needed to Address BC

New and stronger efforts are needed at all levels to address BC. An initial list of options at the international and regional levels includes:

- Developing a treaty under UNEP.
- Expanding the post-2012 UN climate treaty to include black carbon or aerosols.
- Developing regional arrangements, including under the Arctic Council.
- Establishing specially protected areas to restrict shipping in the Arctic and other areas sensitive to BC's effect on albedo.
- Expanding and strengthening controls on shipping under the International Maritime Organization.
- Expanding and strengthening controls on aviation under the International Civil Aviation Organization
- Expanding and strengthening controls on stationary and mobile sources under the Convention on Long-range Transboundary Air Pollution.

Building on the existing national laws noted below in the discussion on compliance, there are many options at the national and local level to develop new and stronger laws to address BC. These laws can be pursued by parliamentarian groups such as GLOBE, as well as by national lawmaking bodies. In addition, there are other policy processes that can be used to address black carbon immediately, including:

- Establishing a global funding source, similar to the Global Fund for HIV/AIDS, Tuberculosis and Malaria (GFATM), which would advocate for, and directly fund, initiatives that reduce BC emissions, by using grants, loans and/or matching funds incentives.
- Encouraging bilateral efforts to reduce BC emissions, which could involve both government cooperation and public-private cooperation as under the Asia Pacific Partnership.
- Using the World Bank Climate Investment Funds to help reduce BC.
- Emphasizing climate benefits and other synergies of reducing BC with the World Health Organization's efforts to reduce indoor air pollution and improve the health of women and children.
- Emphasizing importance of BC for achieving Millennium Development Goals.
- Pursuing and accounting for the benefits of BC in the World Summit for Sustainable Development's (WSSD) efforts to provide access for the poor to clean energy resources.

One important outcome of the WSSD was UNEP's Partnership for Clean Fuels and Vehicles, which has facilitated the transition to unleaded fuels and is now focusing expanding the availability of ultra-low sulfur diesel (ULSD) fuel.⁸⁴ This fuel not only lowers sulfur emissions, leading to less overall air pollution, but also allows the most effective particulate emissions control technologies to be used.

Improving Compliance and Enforcement with Existing Laws Will Reduce BC

Many countries have existing national laws that can be used to start regulating BC emissions, including laws that address particulate emissions. Some examples include:

- PM 2.5 emissions standards
- Banning or regulating slash-and-burn clearing of forests and savannahs;

- Enforcing regulations limiting seasonal agricultural burning, especially during spring ice-melt;
- Requiring complementary reductions in warming agents such as black carbon when emissions of cooling agents such as sulfates are reduced; otherwise air pollution reduction efforts can greatly exacerbate the climate problem;
- Requiring shore-based power/electrification of ships at port, regulating idling at terminals, and mandating fuel standards for ships seeking to dock at port;
- Requiring regular vehicle emissions tests, retirement, or retrofitting (e.g., adding particulate traps), including penalties for failing to meet air quality emissions standards, and heightened penalties for on-the-road “super-emitting” vehicles;
- Promoting the use of non-diesel fuels;
- Limiting the use of chimneys and other forms of biomass burning in urban and non-urban areas;
- Requiring permits to operate industrial, power generating, and oil refining facilities and periodic permit renewal and/or modification of equipment; and
- Requiring filtering technology and high-temperature combustion (e.g. ultra-super-critical coal) for existing power generation plants, and regulating annual emissions from power generation plants.

Enforcement of these and related existing national laws, along with appropriate compliance assistance, will promote near-term climate mitigation, as well as strong co-benefits.⁸⁵

FOR MORE INFORMATION, PLEASE CONTACT:

Durwood Zaelke, President, IGSD, zaelke@igsd.org
Dennis Clare, Senior Law Fellow, IGSD, dclare@igsd.org

Table 1: Estimates of Black Carbon Climate (Radiative) Forcings by Effect

Source	Black Carbon Radiative Forcing (W/m ²)				
	Direct Forcing	Semi-Direct Effect ⁸⁶	Dirty Clouds Effect ⁸⁷	Snow/Ice Albedo Effect	Total
IPCC (2007) ⁸⁸	0.34 ± 0.15	-	-	0.1 ± 0.1	0.44 ± 0.25
Jacobson (2001, 2004, and 2006)	0.55 ⁸⁹	-	0.03 ⁹⁰	0.06 ⁹¹	0.64 ⁹²
Hansen (2001, 2002, 2003, 2005, and 2007)	0.2 - 0.6 ⁹³	0.3 ± 0.3 ⁹⁴	0.1 ± 0.05 ⁹⁵	0.2 ± 0.1 ⁹⁶	0.8 ± 0.4 (2001) 1.0 ± 0.5 (2002) ≈0.7 ± 0.2 (2003) 0.8 (2005) ⁹⁷
Hansen & Nazarenko (2004) ⁹⁸	-	-	-	~ 0.3 globally	-
				1.0 ⁹⁹ arctic	
Ramanathan (2007) ¹⁰⁰	0.9	-	-	0.1 to 0.3	1.0 to 1.2

Table 2: Estimated Climate Forcings (W/m²)

Component	IPCC (2007) ¹⁰¹	Hansen, <i>et al.</i> (2005) ¹⁰²
CO ₂	1.66	1.50
BC	0.05-0.59	0.8
CH ₄	0.48	0.55
Tropospheric Ozone	0.35	0.40
Halocarbons	0.34	0.30
N ₂ O	0.16	0.15

Endnotes

¹ V. Ramanathan and G. Carmichael, *Global and regional climate changes due to black carbon*, 1 NATURE GEOSCIENCE 221-22 (23 March 2008), at 221 (“... emissions of black carbon are the second strongest contribution to current global warming, after carbon dioxide emissions”). Other scientists have also calculated that BC may be second only to CO₂ in its contribution to climate change, including Tami C. Bond & Haolin Sun, *Can Reducing Black Carbon Emissions Counteract Global Warming*, ENVIRON. SCI. TECHN. (2005), at 5921 (“BC is the second or third largest individual warming agent, following carbon dioxide and methane.”); and J. Hansen, *A Brighter Future*, 53 CLIMATE CHANGE 435 (2002), available at http://pubs.giss.nasa.gov/docs/2002/2002_Hansen_1.pdf (calculating the climate forcing of BC at 1.0 +/- 0.5 W/m²). See also, IPCC, *Changes in Atmospheric Constituents and in Radiative Forcing*, in CLIMATE CHANGE 2007: THE PHYSICAL SCIENCE BASIS. CONTRIBUTION OF WORKING GROUP I TO THE FOURTH ASSESSMENT REPORT OF THE INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE, Table 2.13 (2007), available at <http://www.ipcc.ch/ipccreports/ar4-wg1.htm>

² See Mark Jacobson, *Control of Fossil-Fuel Particulate Black Carbon and Organic Matter, Possibly the Most Effective Method of Slowing Global Warming*, 107 J. GEOPHYS. RES. D19 (2002).

³ See IGSD’s briefing note on tipping points, *Abrupt Climate Changes Approaching Faster than Previously Predicted: Fast-Track Climate Mitigation Strategies Needed (December 2008)*.

⁴ Abrupt climate change refers to the passing of a point beyond which no further inputs are required for the climate system to amplify itself irreversibly out of control on human time-scales. Timothy Lenton, Hermann Held, Elmar Kriegler, Jim Hall, Wolfgang Lucht, Stefan Rahmstorf, and Hans Joachim Schellnhuber, *Tipping elements in the Earth’s climate system*, 105 PROC. OF THE NAT’L ACAD. OF SCI. U.S.A. 6 (Feb. 12, 2008) (The palaeoclimate records show that past climate changes have included both steady linear changes, as well as abrupt non-linear changes where small increases in warming produced large and irreversible impacts once a tipping point was passed, including rapid loss of ice causing significant sea-level rise. Abrupt climate changes also are possible in the future. Tipping points for ice-melt in the Arctic and ice-melt and disintegration of the Greenland Ice Sheet are considered to be among the most sensitive. The tipping point for the loss of the West Antarctic Ice Sheet is considered less sensitive, though with large uncertainty. Other tipping points may apply to the Atlantic thermohaline circulation, the Amazon rainforest and boreal forests, the El Niño phenomenon, and the West African monsoon.) See also James Hansen, *Scientific reticence and sea level rise*, ENVIRON. RES. LETT. 2 (2007); James Hansen, *Climate Catastrophe*, NEW SCIENTIST (28 July 2007); Committee on Abrupt Climate Change, *Abrupt Climate Change: Inevitable Surprises*, National Academy Press, Washington, D.C., 2003 (the “available evidence suggests that abrupt climate changes are not only possible, but likely in the future, potentially with large impacts on ecosystems and societies”); See also Peter Schwartz & Doug Randall, *An Abrupt Climate Change Scenario and Its Implications for United States National Security* (2003) (warning that result of abrupt climate change without adequate preparation “could be a significant drop in the human carrying capacity of the Earth’s environment”, including shortages of food and fresh water, drought, and flooding, which could lead to geopolitical destabilization and “skirmishes, battles, and even war.”), <http://www.gbn.com/ArticleDisplayServlet.srv?aid=26231>; and Chris Abbott, Paul Rogers, and John Slobada, *Global Responses to Global Threats: Sustainable Security for the 21st Century*, Oxford Research Group, June 2006, http://www.oxfordresearchgroup.org.uk/publications/briefing_papers/globalthreats.php.

⁵ James Hansen recently estimated that the concentration beyond which the CO₂ level in the atmosphere is potentially catastrophic is 350ppm, a point which has already been passed. James Hansen, *Target Atmospheric CO₂: Where Should Humanity Aim?*, at 11 (18 June 2008) (“Equilibrium sea level rise for today’s 385 ppm CO₂ is at least several meters, judging from paleoclimate history. Accelerating mass losses from Greenland and West Antarctica heighten concerns about ice sheet stability. An initial CO₂ target of 350 ppm, to be reassessed as the effect on ice sheet mass balance is observed, is suggested.”) (Internal citations omitted.)

⁶ V. Ramanathan and G. Carmichael, *supra*, note 1.

⁷ Drew Shindell & Greg Faluvegi, *Climate response to regional radiative forcing during the 20th century*, 2 NAT. GEOSCI. 294, 298 (2009).

⁸ Flanner, M.G., C.S. Zender, J.T. Randerson, and P.J. Rasch, *Present-day climate forcing and response from black carbon in snow*, 112 J. GEOPHYS. RES. D11202 (2007) (noting “black carbon (BC), the strongly absorbing component of carbonaceous aerosols”).

⁹ V. Ramanathan & G. Carmichael, *supra*, at 226.

¹⁰ Forster, P. et. al., *Changes in Atmospheric Constituents and in Radiative Forcing*, in CLIMATE CHANGE 2007: THE PHYSICAL SCIENCE BASIS. CONTRIBUTION OF WORKING GROUP I TO THE FOURTH ASSESSMENT REPORT OF THE INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE (2007), available at <http://www.ipcc.ch/ipccreports/ar4-wg1.htm>.

¹¹ V. Ramanathan and G. Carmichael, *supra*, note 1.

¹² *Id.*

¹³ IPCC, *Technical Summary*, in CLIMATE CHANGE 2007: THE PHYSICAL SCIENCE BASIS. CONTRIBUTION OF WORKING GROUP I TO THE FOURTH ASSESSMENT REPORT OF THE INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE, 21 (2007) available at <http://www.ipcc.ch/ipccreports/ar4-wg1.htm>.

¹⁴ Mark Z. Jacobson, Testimony for the Hearing on Black Carbon and Climate Change, U.S. House Committee on Oversight and Government Reform 12 (18 October 2007), available at <http://oversight.house.gov/documents/20071018110606.pdf> [hereinafter Jacobson Testimony]; V. Ramanathan and G. Carmichael, *supra* note 1, at 226 (Reducing future black carbon, or soot, emissions “offers an opportunity to mitigate the effects of global warming trends in the short term.” Drastic climate mitigation results from BC’s “significant contribution to global radiative forcing” and its “much shorter lifetime [estimated to be one week] compared with CO₂ [which has a lifetime of 100 years or more]”).

¹⁵ V. Ramanathan, Testimony for the Hearing on Black Carbon and Climate Change, U.S. House Committee on Oversight and Government Reform 3 (18 October 2007), available at <http://oversight.house.gov/documents/20071018110734.pdf> [hereinafter Ramanathan Testimony] (“Thus a drastic reduction in BC has the potential of offsetting the CO₂ induced warming for a decade or two.”).

¹⁶ Timothy Lenton, Hermann Held, Elmar Kriegler, Jim Hall, Wolfgang Lucht, Stefan Rahmstorf, and Hans Joachim Schellnhuber, *Tipping elements in the Earth’s climate system*, 105 PROC. OF THE NAT’L ACAD. OF SCI. 6 (12 February 2008) (“The greatest threats are tipping the Arctic sea-ice and the Greenland ice sheet. . .”); J. Hansen, *Climate Catastrophe*, NEW SCIENTIST (28 July 2007) (“...the primary issue is whether global warming will reach a level such that ice sheets begin to disintegrate in a rapid, non-linear fashion on West Antarctica, Greenland or both.”).

¹⁷ Jacobson Testimony, *supra* note 14, at 3. Gross global warming should result in about 2°C temperature rise. However, observed global warming is only about .8°C because cooling particles offset much of the warming. Reducing fossil fuel and biofuel soot would reduce about 40% of the observed warming and about 16% of the gross warming. (“The figure also shows that fossil-fuel plus biofuel soot may contribute to about 16% of gross global warming (warming due to all greenhouse gases plus soot plus the heat island effect), but its control in isolation could reduce 40% of net global warming.”).

¹⁸ *Id.*, at 4.

¹⁹ *Id.*

²⁰ *Id.* Because it is an aerosol, there is no standardized formula for developing global warming potentials (GWP) for black carbon. However, attempts to derive GWP100 range from 190 – 2240. Jacobson M Z, *Correction to ‘Control of fossil-fuel particulate black carbon and organic matter, possibly the most effective method of slowing global warming,’* 110 J. GEOPHYS. RES. D14105 (2005) (GWP BC – 190); Hansen, J., Mki. Sato, P. Kharecha, G. Russell, D.W. Lea, and M. Siddall, *Climate change and trace gases*, PHIL. TRANS. ROYAL. SOC. A, 365, 1925 (2007) (GWP BC – 500); Bond, T. and Haolin, Sun, “Can Reducing Black Carbon Emissions Counteract Global Warming?” ENVTL. SCI. & TECH., 5921 (August 2005) (GWP BC – 680); Jacobson Testimony, *supra* note 18 at 4 (GWP BC – 2240).

²¹ Jacobson Testimony, *supra*, note 14 at 4.

²² Levy, H. II, M.D., et. al., *Strong Sensitivity of late 21st century climate to projected change in short-lived air pollutants*, 113 J. GEOPHYS. RES. D06102, 2 (2008) (BC and OC emissions, which are scaled to carbon monoxide (CO) emissions, increase continuously and almost double by 2100.); *id.* (“These emissions are based on projections of technological change, economic and population growth, and regulatory action out to 2100.”).

²³ *Id.* at 1 (“However, by year 2100, the projected decrease in sulfate aerosol (driven by a 65% reduction in global sulfur dioxide emissions) and the projected increase in black carbon aerosol (driven by a 100% increase in its global emissions) contribute to a significant portion of the simulated A1B surface warming relative to the year 2000”).

²⁴ Jacobson Testimony, *supra*, at 3.

²⁵ See *supra*, note 7.

²⁶ Charles Zender, Written Testimony for the Hearing on Black Carbon and Climate Change, U.S. House Committee on Oversight and Government Reform 1 (18 October 2007), available at <http://oversight.house.gov/documents/20071018110919.pdf> [hereinafter Zender Testimony].

²⁷ *Id.* at 6.

²⁸ James Hansen & Larissa Nazarenko, *Soot Climate Forcing Via Snow and Ice Albedos*, 101 PROC. OF THE NAT’L ACAD. OF SCI. 423 (13 January 2004) 425.

²⁹ *Id.* at 428.

³⁰ *Id.* at 425.

³¹ Zender Testimony at 4.

³² P.K. Quinn, T.S. Bates, E. Baum, N. Doubleday, A.M. Fiore, M. Flanner, A. Fridlind, T.J. Garrett, D. Koch, S. Menon, D. Shindell, A. Stohl, and S.G. Warren. *Short-lived Pollutants in the Arctic: Their Climate Impact and Possible Mitigation Strategies*, 8 ATMOS. CHEM. PHYS. 1723, 1731 (2008); See David Shukman, *Vast Cracks Appear in Arctic Ice*, BBC NEWS (23 May 2008), available at <http://news.bbc.co.uk/2/hi/science/nature/7417123.stm> (A recent expedition study by Canada confirmed vast cracks stretching for more than 10 miles on Ward Hunt).

³³ *Id.* at 1732.

³⁴ *Id.*

³⁵ *Id.*; J. Hansen & M. Sato, *et al.*, *Dangerous Human-Made Interference with Climate: a GISS modelE Study 7* ATMOS. CHEM. PHYS. DISCUSS. 2287, 2287 (2007) (“We suggest that Arctic climate change has been driven as much by pollutants (O₃, its precursors CH₄ and soot) as by CO₂, offering hope that dual efforts to reduce pollutants and slow CO₂ growth could minimize Arctic change”).

³⁶ V. Ramanathan & G. Carmichael, *supra* note 1, at 221.

³⁷ *Id.* at 224.

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ Lester R. Brown, *Melting Mountain Glaciers Will Shrink Grain Harvests in China and India*, PLAN B UPDATE, Earth Policy Institute (20 March 2008), available at <http://www.earth-policy.org/Updates/2008/Update71.htm> (Melting Himalayan glaciers will soon reduce water supply for major Chinese and Indian rivers (Ganges, Yellow River, Yangtze River) that irrigate rice and wheat crops that feed hundreds of millions and “could lead to politically unmanageable food shortages.”).

⁴¹ *Supra* note 1, at 221.

⁴² Jacobson Testimony, *supra* note 14, at 4.

⁴³ Clean Air Fine Particle Implementation Rule, 72 Fed. Reg. 20586, 20587 (April 25, 2007) (to be codified as 40 C.F.R. pt. 51), available at <http://www.epa.gov/fedrgstr/EPA-AIR/2007/April/Day-25/a6347.pdf>; Press Release, European Union, Environment: Commission welcomes final adoption of the air quality directive, (April 14, 2008), available at <http://europa.eu/rapid/pressReleasesAction.do?reference=IP/08/570&format=HTML&aged=0&language=EN&guiLanguage=e>

⁴⁴ Tami Bond, Testimony for the Hearing on Black Carbon and Climate Change, U.S. House Committee on Oversight and Government Reform 2-3 (October 18, 2007), available at <http://oversight.house.gov/documents/20071018110647.pdf> [hereinafter Bond Testimony].

⁴⁵ Jacobson Testimony, *supra* note 18, at 5.

⁴⁶ Tami Bond, *Summary: Aerosols*, Air Pollution as a Climate Forcing: A Workshop, Honolulu, Hawaii, April 29-May 3, 2002, available at <http://www.giss.nasa.gov/meetings/pollution2002>.

⁴⁷ V. Ramanathan & G. Carmichael, *supra* note 6, at 226.

⁴⁸ V. Ramanathan & G. Carmichael, *supra* note 6, at 226.

⁴⁹ Ramanathan Testimony, *supra* note 15, at 4.

⁵⁰ V. Ramanathan & G. Carmichael, *supra* note 1, at 221.

⁵¹ V. Ramanathan & G. Carmichael, *id.*

⁵² V. Ramanathan & G. Carmichael, *id.*

⁵³ V. Ramanathan & G. Carmichael, *id.* at 224.

⁵⁴ Bond Testimony, *supra* note 44 at 1-2.

⁵⁵ Jacobson Testimony, *supra* note 14, at 5-6.

⁵⁶ Although shipping only accounts for 1.7% of the global BC inventory, given the expected increase in shipping throughout regions especially sensitive to BC like the Arctic, it still represents a strong option for BC reductions. Lack, D., B. Lerner, C. Granier, T. Baynard, E. Lovejoy, P. Massoli, A. R. Ravishankara, and E. Williams, Light absorbing carbon emissions from commercial shipping, 35 Geophysical Res. Letters L13815 (2008).

⁵⁷ Mark. Z. Jacobson, *The Short-Term Cooling but Long-Term Global Warming Due to Biomass Burning*, 17 J. OF CLIMATE 2909, 2923 (“... whereas aerosol particles emitted during burning may cause a short-term cooling of global climate, longer-lived greenhouse gases may cause warming (or cancel the cooling) after several decades. As such, reducing biomass burning may cause short-term warming but long-term cooling or no change in temperature. Although the eventual cooling may not appear for many years, its magnitude may be as large as 0.6 K after 100 yr.”).

⁵⁸ *Supra*, note 32 at 1731.

⁵⁹ Stohl, A., E. Andrews, J. F. Burkhart, C. Forster, A. Herber, S. W. Hoch, D. Kowal, C. Lunder, T. Mefford, J. A. Ogren, S. Sharma, N. Spichtinger, K. Stebel, R. Stone, J. Ström, K. Tørseth, C. Wehrli, and K. E. Yttri, Pan-Arctic enhancements of light absorbing aerosol concentrations due to North American boreal forest fires during summer 2004, 111 J. GEOPHYS. RES. D22214, doi:10.1029/2006JD007216, 2006.

⁶⁰ *Supra*, note 32.

⁶¹ Ramanathan Testimony, *supra* note 15, at 4.

⁶² Jacobson Testimony, *supra* note 14, at 5.

⁶³ J. Hansen & L. Nazarenko, *supra* note 28, at 428.

⁶⁴ Jacobson Testimony, *supra* note 14, at 9.

⁶⁵ Jacobson offers an estimate of total U.S. CO₂ emissions in 2005 of 6270 metric tonnes, 26% of which is 1630. *Id.*

⁶⁶ Jacobson Testimony, *supra* note 14, at 9.

⁶⁷ Manufacturers of Emission Controls Association (MECA), “Emission Control Technologies for Diesel-Powered Vehicles,” 9 (December 2007) (“Diesel oxidation catalysts installed on a vehicle’s exhaust system can reduce total PM typically by as much as 25 to over 50 percent by mass, under some conditions depending on the composition of the PM being emitted”), available at: <http://www.meca.org/galleries/default-file/MECA%20Diesel%20White%20Paper%2012-07-07%20final.pdf>.

⁶⁸ *Id.*, (“DPFs can achieve up to, and in some cases, greater than a 90 percent reduction in PM. High efficiency filters are extremely effective in controlling the carbon fraction of the particulate, the portion of the particulate that some health experts believe may be the PM component of greatest concern”).

⁶⁹ *Id.*, at 5, (“Mobile source BC emissions are estimated at 234 Gg in 2001, representing 54 percent of the nationwide BC emissions of 436 Gg. Under Scenario F, mobile source emissions are projected to decline to 71 Gg, a reduction of 163 Gg.”)

⁷⁰ Bahner, Mark A., Weitz, Keith A., Zapata, Alexandra and DeAngelo, Benjamin, Use of Black Carbon and Organic Carbon Inventories for Projections and Mitigation Analysis,” 1, (2007) available at: <http://www.epa.gov/ttn/chief/conference/ei16/session3/k.weitz.pdf>.

⁷¹ EPA, Heavy-Duty Highway Diesel Program, available at: <http://www.epa.gov/oms/highway-diesel/index.htm> (“Once this action is fully implemented...Soot or particulate matter will be reduced by 110,000 tons a year”); EPA, Clean Air Nonroad Diesel Rule—Facts and Figures, available at: <http://www.epa.gov/nonroad-diesel/2004fr/420f04037.htm> (“Environmental Benefits When the Fleet of Older Nonroad Engines Has Fully Turned Over by 2030: Annual reductions of Fine PM (PM_{2.5}): 129,000 tons”).

⁷² Diesel Technology Forum, “Technology Definitions,” available at: <http://www.dieselforum.org/meet-clean-diesel/what-is-clean-diesel/new-technologies/>

⁷³ *Id.*

⁷⁴ Conor C. O. Reynolds & Milind Kandlikar, *Climate Impacts of Air Quality Policy: Switching to a Natural Gas-Fueled Public Transportation System in New Delhi*, ENVIRON. SCI. TECHNOL. (forthcoming 2008) (“When aerosol emissions are included, the switch to CNG fueling results in a climate benefit, largely because of the dramatic reduction of black carbon emissions from the diesel bus engines”). The fuel switching policy was implemented with the aid of the Indian Supreme Court. See Urvashi Narain and Ruth Greenspan Bell, *Who Changed Delhi’s Air? The Roles of the Court and the Executive in Environmental Policymaking*, Resources for the Future Discussion Paper 05-48 (December 2005) <http://www.rff.org/rff/documents/rff-dp-05-48.pdf> (“[T]he main role of the Supreme Court was to force the government to implement previously announced policies. ... [T]he Delhi experience for instituting change has become a model for other Indian cities as well as neighboring countries.”)

⁷⁵ Conor C. O. Reynolds & Milind Kandlikar, *Climate Impacts of Air Quality Policy: Switching to a Natural Gas-Fueled Public Transportation System in New Delhi*, ENVIRON. SCI. TECHNOL. (forthcoming 2008) (“However, when aerosol emissions are taken into account in our model, the net effect of the switch is estimated to be a 10% reduction in CO₂(e), and there may be as much as a 30% reduction in CO₂(e)”).

⁷⁶ *Id.*, at Section 3.1 (“In total there is about a 10% reduction of net CO₂(e) emissions, and if buses are considered separately, net CO₂(e) emissions are reduced by about 20%”).

⁷⁷ *Id.*

⁷⁸ Lack, D., B. Lerner, C. Granier, T. Baynard, E. Lovejoy, P. Massoli, A. R. Ravishankara, and E. Williams, Light absorbing carbon emissions from commercial shipping, 35 Geophysical Res. Letters L13815 (2008).

⁷⁹ That is, if particulate filters could be shown reduce BC emissions 90 percent from ships as they do for land vehicles, 120,000 metric tons of today’s 133,000 metric tons of emissions would be prevented.

⁸⁰ V. Ramanathan & G. Carmichael, *supra* note 1, at 226.

⁸¹ V. Ramanathan & G. Carmichael, *id.*

⁸² *Supra*, note 2 (citing C. A. Pope III and D. W. Dockery, *Epidemiology of particle effects*, in S. T. Holgate, *et al.*, eds., AIR POLLUTION AND HEALTH 673– 705 (1999) and statistics from the World Health Organization).

⁸³ See Mike Bergin, *The Influence of Aerosols on Plant Growth*, Day 4 of Air Pollution as a Climate Forcing: A Workshop (2002), available at http://www.giss.nasa.gov/meetings/pollution2002/d4_bergin.html.

⁸⁴ See <http://www.unep.org/pcfv/index.asp>.

⁸⁵ The International Network for Environmental Compliance & Enforcement has issued a *Climate Compliance Alert on Black Carbon*: http://inece.org/climate/INECEClimateComplianceAlert_BlackCarbon.pdf.

⁸⁶ Mark Z. Jacobson, *Effects of Anthropogenic Aerosol Particles and Their Precursor Gases on California and South Coast Climate*, California Energy Commission, 6 (Nov. 2004), available at <http://www.stanford.edu/group/efmh/jacobson/CEC-500-2005-003.PDF> (BC’s semi-direct effect occurs when “solar absorption by a low cloud increases stability below the cloud, reducing vertical mixing of moisture to the cloud base, thinning the cloud.”).

⁸⁷ *Carbon’s Other Warming Role*, GEOTIMES (May 2001), available at <http://www.geotimes.org/mar01/warming.html> (BC produces “dirty cloud droplets, causing an “indirect” impact that reduces a cloud’s reflective properties.”).

⁸⁸ IPCC, *supra* note 1 at 163-64, and 185 (2007).

⁸⁹ Mark Z. Jacobson, *Strong Radiative Heating Due to the Mixing State of Black Carbon in Atmospheric Aerosols*, NATURE, 409, 695-697 (2001) (“The final yearly averaged direct forcing due to BC in the external mixture, the multiple-distribution coated-core, and the single internally-mixed, coated-core distribution cases from Fig. 3 were 0.31, 0.55 and 0.62 W m⁻², respectively. The multiple-distribution BC direct forcing (0.55) falls between direct-forcing estimates for CH₄ (0.47 W/m²) and CO₂ (1.56 W/m²) from IPCC [2001].”).

⁹⁰ Mark Z. Jacobson, *Climate response of fossil fuel and biofuel soot, accounting for soot’s feedback to snow and sea ice albedo and emissivity*, 109 J. GEOPHYS. RES. D21201 (2004). (Dirty Clouds Effect of .03 W m⁻²).

⁹¹ Mark Z. Jacobson, *Effects of Externally-Through-Internally-Mixed Soot Inclusions within Clouds and Precipitation on Global Climate*, 110 J. PHYS. CHEM. A. 6860-6873 (2006). (Snow/Ice Albedo Effect of .06 W m⁻²).

⁹² This figure has been obtained by adding Jacobson’s estimates for BC’s direct and indirect forcings. See *supra*, notes 75-77 and accompanying text.

⁹³ James E. Hansen and Makiko Sato, Figure 1 in *Trends of Measures Climate Forcing Agents*, 98 PROC. OF THE NAT’L ACAD. OF SCI. 14778, 14779 (2001). (Hansen 2001 estimate – Direct Forcing – 0.6 W/m² Total forcing – 0.8 ± 0.4 W/m²); J. Hansen, *supra* note 28, at 435; J. Hansen, *et al.*, *Climate Change and Trace Gases*, 365 PHIL. TRANS. R. SOC. 1925, 1942 (2007) (Hansen 2007 estimate – “Soot from fossil fuel burning, i.e. highly absorbing aerosols that contain black carbon (BC) and organic carbon (OC), are estimated to cause a global climate forcing of 0.22 W m⁻². This is a conservative estimate for fossil fuel BC forcing . . . because it assumes a high OC/BC ratio for fossil fuel emissions. In addition, it assigns 50% of the aerosol indirect effect (which causes cooling) to soot (BC/OC).”).

⁹⁴ *Id.*.

⁹⁵ *Id.*.

⁹⁶ *Id.*.

⁹⁷ James E. Hansen and Makiko Sato, Figure 1 in *Trends of Measures Climate Forcing Agents*, 98 PROC. OF THE NAT’L ACAD. OF SCI. 14778, 14779 (2001). (Hansen 2001 estimate – Direct Forcing – 0.6 W m⁻², Total forcing – $0.8 + 0.4$ W m⁻²); J. Hansen, *supra* note 28, at 435; Makiko Sato, James Hansen, Dorthy Koch, Andrew Lacis, Reto Ruedy, Oleg Dubovik, Brent Holben, Mian Chin, and Tica Novakov, *Global Atmospheric Black Carbon Inferred from AERONET*, 100 PROC. OF THE NAT’L ACAD. OF SCI. 6319, at 6323 (2003) (. . . we estimate the anthropogenic BC forcing as $\approx 0.7 \pm 0.2$ W/m².); J. Hansen, *et al.*, *Climate Change and Trace Gases*, 365 PHIL. TRANS. R. SOC. 1925, 1942 (2007) (Hansen 2007 estimate – “Soot from fossil fuel burning, i.e. highly absorbing aerosols that contain black carbon (BC) and organic carbon (OC), are estimated to cause a global climate forcing of 0.22 W m⁻². This is a conservative estimate for fossil fuel BC forcing . . . because it assumes a high OC/BC ratio for fossil fuel emissions. In addition, it assigns 50% of the aerosol indirect effect (which causes cooling) to soot (BC/OC).”).

⁹⁸ J. Hansen & L. Nazarenko, *supra* note 28, 426.

⁹⁹ *Id.*, at 425.

¹⁰⁰ Ramanathan Testimony, *supra* note 15.

¹⁰¹ IPCC, *supra* note 1.

¹⁰² J. Hansen, *et al.*, Hansen, J., et al. (2005), *Efficacy of climate forcings*, J. GEOPHYS. RES., 110, D18104, doi:10.1029/2005JD005776.