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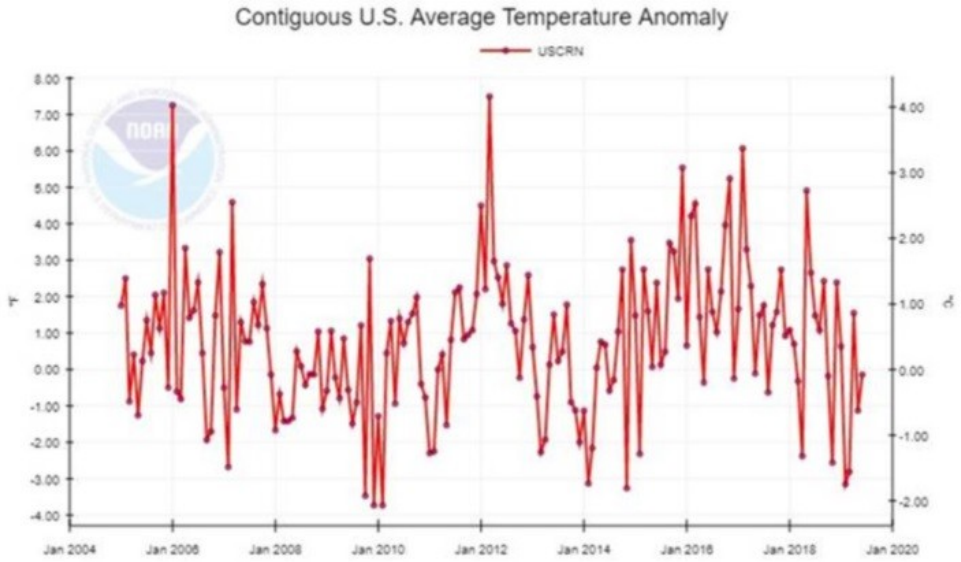
I oppose implementation of the Transportation and Climate Initiative [TCI].

Claims of catastrophic warming of Massachusetts, New England, and the contiguous 48 States, now or soon, are not supported by temperature data collected by NOAA's United States Climate Reference Network [USCRN] and United States Regional Climate Reference Network [USRCRN], which are the sources of the most accurate and unbiased climate data available for the United States. Network description, data, and graphs are available for public scrutiny via:

https://www.ncdc.noaa.gov/data-access/land-based-station-data/land-based-datasets/us-climate-reference-network-uscrn
http://www.ncdc.noaa.gov/crn/ - national scale
http://www.ncdc.noaa.gov/crn/usrcrn/ - regional scale
http://www.ncdc.noaa.gov/crn/qcdatasets.html - access to datasets and graphs of datasets

According to these websites: USCRN and USRCRN programs aim to maintain sustainable high-quality climate observation networks that 50 years from now can with the highest degree of **scientific** confidence answer the question: How has USA climate changed over the past 50 years? USCRN is NOAA's premiere land-surface temperature observation network. It is managed by NOAA's National Climatic Data Center and operated in partnership with NOAA's Atmospheric Turbulence and Diffusion Division. It consists of a network completed in 2008 of 114 stations distributed across the 48 contiguous states, two stations in Hawaii, and a network of 29 stations in Alaska begun in 2009 and still being deployed. These stations were designed with climate **science** in mind. Three independent measurements of temperature and precipitation are made at each station, insuring continuity of a well-calibrated, highly accurate observation record. The stations are placed in pristine environments that are expected to be free of development for many decades. Stations are monitored and maintained to high standards and calibrated on an annual basis. In addition to temperature and precipitation, these stations also measure solar radiation, surface 'skin' temperature, and surface winds. They also include triplicate measurements of soil moisture and soil temperature at five depths, as well as atmospheric relative humidity for most of the 114 contiguous U.S. stations. Stations in Alaska and Hawaii provide network experience and observations in polar and tropical regions, respectively. Regional-scale USRCRN maintains the same high quality of climate **science** measurements as national-scale USCRN, but its stations are spaced more closely and focus solely on temperature and precipitation. Beginning with a pilot project in the Southwest that was completed in 2011, USRCRN stations will be deployed at an 80-mile [130 km] spatial resolution across the United States to provide for the detection of regional climate change signals.

So far, 15 years of USCRN data have been collected. These data do not support claims that temperature is rising inexorably and catastrophically, or even moderately, in the United States. For an example, see the plot below of USCRN temperature data for the contiguous 48 states from 2004-2019., one out of many data-plots available via http://www.ncdc.noaa.gov/crn/qcdatasets.html. This plot reveals, contrary to computer climate model predictions, that during the past fifteen years there has been, in fact, no inexorable, catastrophic rise in temperature across the 48 contiguous states. As a consequence, there is no factual **scientific** basis justifying the Transportation and Climate Initiative. For that reason, the it must be abandoned.



State and Federal government officials should be relying on USCRN and USRCRN observations such as those plotted above to formulate rational fact-based policies, regulations, and legislation rather than on computer model predictions that are known to conflict substantially with observed temperatures. A computer model is merely a hypothesis stated in the language of mathematics. The scientific method requires that the predictions of hypotheses be compared with observations. If predictions and observations conflict, the scientific method deems the hypothesis [e.g., the computer model] to have been falsified. The scientific method further requires that falsified hypotheses be discarded or re-formulated and re-tested, over and over again. The scientific method is an iterative process that can tell us with certainty only what is not true, never what is absolutely true, because the next observation might conflict with a prediction and thereby reveal the falsity of the hypothesis. As a consequence of the substantial discrepancies between temperature observations and climate computer model predictions, belief that climate models speak truth is an act of faith rather than of science, making the Transportation and Climate Initiative a **faith**-based initiative, not a **science**-based initiative. Faith should never be the basis for environmental regulations, legislation, and fees. They should be grounded in scientific fact [observation and measurement], not discrepancy-laden computer model predictions [make-believe].