

# ADVANCING U.S. CLIMATE ACTION UNDER FEDERAL POLICY ROLLBACKS

## Authors

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On January 20, 2025, President Trump signed an executive order to withdraw the United States from the Paris Agreement again, leaving a void in U.S. climate leadership on an international scale. However, U.S. climate action will not come to a standstill. After the previous Trump administration's announcement to leave the Paris Agreement in 2017, non-federal actors continued and strengthened their climate actions, and showcased their commitment to maintaining U.S. momentum on climate action to meet the Paris Agreement's goals by joining initiatives such as America's Pledge and signing the We Are Still In Declaration.<sup>1,2</sup> This time, the Biden administration's new U.S. climate target, or nationally determined contribution (NDC), of a 61-66% reduction in greenhouse gas (GHG) emissions by 2035 from 2005 levels,<sup>3</sup> could continue to serve as the "North Star" for non-federal actors to pursue ambitious climate action in the United States.

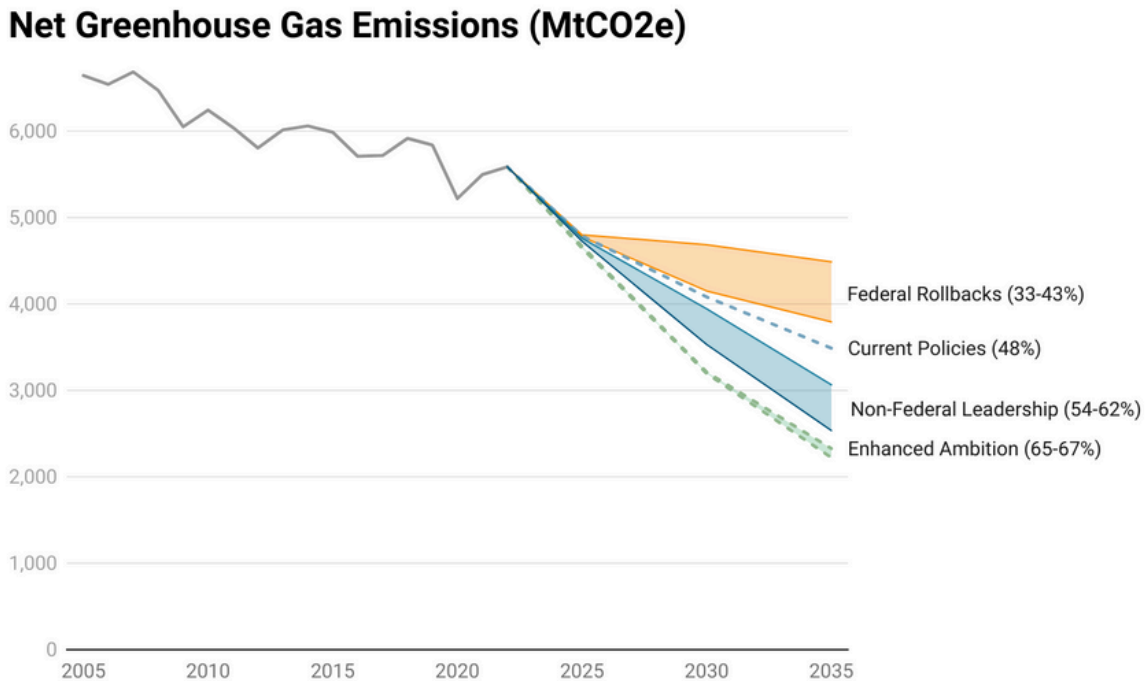
In the coming months, expansive federal rollbacks of climate policies, regulations, and legislation are possible, given recent executive orders,<sup>4</sup> precedent under the previous Trump administration,<sup>5</sup> and stated targets in policy planning documents.<sup>6</sup> Both climate legislation and regulations, such as the recently finalized rules on tailpipe emissions and the Inflation Reduction Act, are at risk of being overturned.

In the face of weakened federal climate action, non-federal actors can help bridge the gap and build progress toward the global climate goals needed to mitigate the worst impacts of climate change. Analyses by the Center for Global Sustainability (CGS), which utilize a field-leading, economy-wide model with explicit representation of both federal and non-federal U.S. climate action, have represented U.S. climate pathways under a range of possible ambition levels and repeatedly demonstrated the critical role of non-federal actors in achieving high-ambition climate targets.<sup>7-11</sup>



CGS research has found that:

- Strong non-federal leadership has the potential to counteract much of federal inaction or rollbacks, as highlighted in a recent CGS analysis.<sup>9</sup> Under enhanced non-federal actions and varying levels of federal climate policy rollbacks or inaction, the United States could achieve 54-62% emissions reductions by 2035, making it possible to achieve the 2035 U.S. NDC.
- However, if the U.S. federal government rolls back key climate regulations and legislation, the United States would only achieve 33-43% GHG emissions reductions relative to 2005 levels by 2035, assuming non-federal actors continue to implement, but do not strengthen, existing policies (Figure 1).



**Figure 1.** GHG emissions across scenarios. The Federal Rollbacks scenario achieves a range of 33%-43% GHG emissions reductions relative to 2005 levels by 2035 based on different assumptions about the extent of federal rollbacks. The Non-Federal Leadership scenario achieves 54-62% emissions reductions by 2035.<sup>9</sup> The Current Policies and Enhanced Ambition scenarios achieve 48% and 65-67% reductions by 2035, respectively.<sup>7</sup> Historical emissions data are taken from EPA's 2021 greenhouse gas inventory, which uses the 100-year global warming potential to convert non-CO<sub>2</sub> gases into CO<sub>2</sub> equivalent.<sup>12</sup>

## Scenario design

- The *Current Policies* scenario includes all on-the-books actions from federal and non-federal actors.<sup>7</sup>
- The *Enhanced Ambition* scenario includes new and expanded policies from federal and non-federal actors.<sup>7</sup>
- The *Non-Federal Leadership* scenario assumes that non-federal actors enhance their policies under varying degrees of federal climate ambition.<sup>9</sup>
- The *Federal Rollbacks* scenario assumes that existing federal climate legislation and regulations are overturned, but existing non-federal policies are maintained. The upper bound of the range assumes that only federal regulations are repealed and the lower bound assumes that in addition to federal regulations, recent climate legislation passed into law is also overturned, including the Inflation Reduction Act and the Bipartisan Infrastructure Law.

The initial CGS assessment of the emissions impacts associated with potential federal rollbacks underscores the importance of accelerated non-federal climate action in maintaining the momentum of the U.S. clean energy transition. In addition to increased climate impacts, slowing down this transition may have significant health, economic, and social effects on U.S. communities, which will be further assessed in a forthcoming analysis.

Globally, accelerated transitions are needed from all countries to keep the 1.5°C temperature target under the Paris Agreement within reach.<sup>13</sup> As countries prepare to submit their new NDCs for 2035 over the coming months, a U.S. withdrawal from the Paris Agreement can potentially affect their ambition level and raise questions about the global outcome. However, U.S. climate action is built on strong market forces, consumer benefits, and bottom-up policy authority and climate leadership, which will continue even without strong federal climate leadership. To maintain critical international partnerships despite the U.S. withdrawal, accelerated leadership from non-federal actors can keep the U.S. on a path of progress and contribute significantly toward the existing U.S. climate pledges and global climate goals.

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