No. 25-170

IN THE

Supreme Court of the United States

SUNCOR ENERGY (U.S.A.) INC., *et al.*,

Petitioners,

v.

COUNTY COMMISSIONERS
OF BOULDER COUNTY, *et al.*,

Respondents.

On Petition for a Writ of Certiorari to the Supreme Court of Colorado

BRIEF OF ATLANTIC LEGAL FOUNDATION, WASHINGTON LEGAL FOUNDATION, AND FEDERATION OF DEFENSE & CORPORATE COUNSEL AS *AMICI CURIAE* IN SUPPORT OF PETITIONERS

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INTEREST OF THE *AMICI CURIAE* [1]

Established in 1977, the **Atlantic Legal Foundation** (ALF) is a national, nonprofit, nonpartisan, public-interest law firm. ALF's mission is to advance the rule of law and civil justice by advocating for individual liberty, free enterprise, property rights, limited and responsible government, sound science in judicial and regulatory proceedings, and effective education, including parental rights and school choice. With the benefit of guidance from the distinguished legal scholars, corporate legal officers, private practitioners, business executives, and prominent scientists who serve on its Board of Directors and Advisory Council, ALF pursues its mission by participating as *amicus curiae* in carefully selected appeals before the Supreme Court, federal courts of appeals, and state supreme courts. *See* atlanticlegal.org.

Washington Legal Foundation (WLF) is a nonprofit, public-interest law firm and policy center with supporters nationwide. WLF promotes free enterprise, individual rights, limited government, and the rule of law. Through its Legal Studies Division, WLF publishes articles by outside experts on issues

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[1] Petitioners' and Respondents' counsel were provided timely notice of this brief in accordance with Supreme Court Rule 37.2. No counsel for a party authored this brief in whole or part, and no party, counsel for a party, or person other than the *amici curiae* and their counsel made a monetary contribution intended to fund preparation or submission of this brief.

affecting its mission, including those on the unwelcome consequences of climate-change tort suits. *See, e.g.*, Lincoln Davis Wilson, *Flawed Federal Jurisdiction Ruling Grants State Court National Climate-Change Policymaking Power*, WLF Legal Opinion Letter (Mar. 25, 2022); Peter Glaser & Lynne Rhode, *Three Federal Courts Reject Public Nuisance As Climate Change Control Tool*, WLF Legal Opinion Letter (Nov. 16, 2007).

The **Federation of Defense & Corporate Counsel** (FDCC) is a not-for-profit corporation with national and international membership of 1,550 defense and corporate counsel working in private practice, as in-house counsel, and as insurance industry professionals. A significant number of FDCC members practice in the trial and appellate courts of the United States both at the federal and state level. Since 1936, FDCC's members have established a strong legacy of representing the interests of civil defendants, including publicly and privately owned businesses, public entities, and individual defendants. The FDCC seeks to assist courts in addressing issues of importance to its membership that concern the fair and predictable administration of justice.

Each of the *amici curiae* has appeared in climate change-related cases which, like this one, seek to regulate interstate greenhouse gas ("GHG") emissions and global warming by imposing multi-million dollar, state-law damages awards and additional relief against fossil fuel energy companies. *See, e.g., Sunoco LP v. City and Cnty. of Honolulu*, *Hawaii*, Nos. 23-947

& 23-952; *B.P. P.L.C. v. Mayor and City Council of Balt.*, No. 19-1189; *Mayor and City Council of Balt. v. B.P. P.L.C.*, No. 11-2025 (Md. Sup. Ct.). *Amici* believe that regulation of interstate GHG emissions is a subject of exclusively federal interest that should be addressed by the policy-makers in the political branches, not by the courts.

SUMMARY OF ARGUMENT

As Colorado Supreme Court Justice Samour emphasized in his dissenting opinion below, this litigation is about "*global* climate change." App-25a. The question presented is extraordinarily important: Does federal law preclude respondents' claims (and similar claims brought by dozens of state and local governments in other pending litigation) for local harm caused by fossil fuel energy companies' alleged substantial role in "exacerbating climate change" and "caus[ing] . . . alteration of the climate"? App-2a. The consequences of allowing these proliferating state-court suits to proceed are readily foreseeable and potentially disastrous not only for the fossil fuel industry, but also for the nation's economy, critical infrastructure, and homeland security.

If respondents can pursue this suit for alleged local harm due to petitioners allegedly causing or exacerbating global climate change, so can tens of thousands of other governmental units throughout the United States. Dozens of state and local governments, many at the urging and with the backing of the plaintiffs' bar and climate activists, already are

attempting to do exactly that. And if they succeed, other types of businesses and even individuals allegedly harmed by climate change will be next in line to sue the same group of fossil fuel defendants—assuming that the industry survives the onslaught by a multitude of state and local governments.

Global climate change is a politically charged, scientifically controversial, multi-source, and borderless phenomenon. Damages suits that attempt to isolate a single type of contributor to, or cause of, global climate change (e.g., the petitioner energy companies' production, marketing, and sale of fossil fuels in the United States)—and fragment their alleged liability for the newly minted *global* tort of altering the earth's climate into myriad politically demarcated pieces (e.g., petitioners' alleged liability to the City of Boulder, Colorado for "causing" or "exacerbating" global climate change)—conflict with two key scientific facts: (i) Climate change has no boundaries, and (ii) there are countless sources of GHG emissions both in the United States and abroad. This is why a city's, county's, or other political subdivision's claims for the alleged local effects of climate change, no matter how mundanely labeled or artfully drafted, necessarily implicate uniquely federal interests that preclude state-law climate-change tort suits.

Instead, a uniform federal rule of decision holding that such suits are constitutionally precluded or statutorily preempted is needed urgently. Allowing Colorado or any other State to adjudicate such suits

would violate the principles of interstate federalism by elevating one State's judicial decisions over those of other States, or by pitting States against each other for dominance over regulation of global warming.

The Court should grant certiorari here and hold that federal law precludes or preempts climate-change tort litigation.

ARGUMENT

The Court Should Grant Certiorari and Hold That Federal Law Precludes Climate-Change Tort Suits

A. The consequences of allowing climate-change tort suits to proliferate are mind-boggling

Like global climate change, respondents' allegations that the petitioner energy companies are liable for "causing, contributing to and exacerbating alteration of the climate," App-2a, have no geographic or political boundaries. If the County and City of Boulder can cash-in on the "climate crisis" by proceeding with this state-court tort suit, there is nothing to prevent Colorado's other 61 counties and 271 municipalities from doing exactly the same.[2] As Colorado Supreme Court Justice Samour warned in his dissenting opinion, "alarmingly, the majority's

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[2] U.S. Census Bureau, 2022 Census of Government, Organization Tables, Table 3, General-Purpose Local Governments By State, https://tinyurl.com/ycxyk5e6.

decision isn't cabined to Boulder—all other Colorado municipalities may bring such claims." App-25a.

And why stop there?

> In the most recent Census of Governments . . . the Census Bureau counted 90,837 governments in the U.S. In addition to the federal government, the 50 state governments and the government of Washington, D.C., there were 3,031 county governments, 35,705 township and municipal governments, 12,546 independent school districts and 39,555 other special-purpose local governments.[3]

The decision below invites nationwide judicial chaos, as well as crippling litigation costs and crushing burdens on the fossil fuel industry. Unless this Court intervenes, each and every State, county, municipal, and special local government will be free to pursue its own multi-million dollar damages suit against the nation's largest fossil fuel energy companies for alleged local harm supposedly attributable to global climate change.

At the very least, there would be an enormous potential for conflicting or inconsistent findings of

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[3] Amy Smaldone & Mark L.J. Wright, Local Governments in the U.S.: A Breakdown by Number and Type, Fed. Res. Bank of St. Louis (Mar. 14, 2024), https://tinyurl.com/cv4yhzpc.

fact, conclusions of law, judgments, imposition of astronomical and overlapping damages awards, and additional remedies. *See, e.g.*, Am. Compl. ¶¶ 532, 534 (asserting that respondents are "entitled to . . . [m]onetary relief to compensate . . . for their **past** and **future** damages and costs to mitigate the impact of climate change" and "remediation and/or abatement of the hazards discussed" in the complaint) (bold text in original); *see* App-28a (Samour, J., dissenting) ("Because there are numerous other local governments within the United States doing just what Boulder has done (and yet others that will undoubtedly follow suit in the future), and because multiple out-of-state courts have now reached the conclusion my colleagues in the majority do in this case, I am worried that we are headed for regulatory chaos.").

Nationwide proliferation of climate-change tort litigation is far from theoretical. It already is happening. *See* Pet. at 6 ("Nearly 60 state and local governments have brought such suits, and more continue to be filed.").[4]

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[4] The website for the San Francisco law firm promoting and handling many of the state and local government climate-change tort suits boasts 26 such cases in which it is involved, and that firm apparently is trolling for more suits to file. *See* Sher Edling LLP, Climate Damage and Deception (listing the firm's climate cases), https://tinyurl.com/mssc3hyt (last visited Aug. 25, 2025);

If these suits are allowed to proceed, the next wave of opportunistic climate-change litigation could be brought by the plaintiffs' bar and climate activists on behalf of a multitude of individual, mass-action, or class-action plaintiffs (e.g., commercial, institutional, and residential property owners) claiming to have been harmed by the fossil fuel industry's alleged climate change-related tortious conduct. The newly minted global tort of "exacerbating climate change" and "*knowingly* caus[ing] and contribut[ing] to the alteration of the climate," App-2a—masquerading here as public and private nuisance, trespass, and other state-law causes of action—could become the plaintiff bar's next "Super Tort." *See* Am. Tort Reform Ass'n (ATRA), *The Plaintiffs' Lawyer Quest for the Holy Grail: The Public Nuisance "Super Tort"* (Mar. 2025) 1 ("[T]oday's public nuisance litigation . . . attempt[s] to subject businesses to liability over societal and political issues—regardless of fault, how the harm developed or was caused, whether the elements of the tort are met, or even if the liability will actually address the issue. Their mantra is, 'Let's make 'Big' [insert business] pay.'").

Despite respondents' disclaimer that they "**do not** seek to enjoin any oil or gas operations and sales," Am. Compl. ¶ 542 (bold text in original), this and every

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see also Columbia Law School/Columbia Climate School, Center for Climate Change Law, U.S. Climate Change Litigation Database (Actions Seeking Money Damages for Losses), https://tinyurl.com/46caec5z (last visited Aug. 25, 2025).

other climate-change tort suit has a transparent political, as well as pecuniary, purpose: destroying the highly regulated oil and gas industry, or at least severely curtailing entirely legal production, sale, and use of fossil fuels in the United States and globally. The 124-page, 544-paragraph Amended Complaint, filed by EarthRights International,[5] like the complaints in numerous similar suits, reads like a climate activist's manifesto against the fossil fuel industry. *See* EarthRights Int'l, *Colorado communities sue fossil fuel companies to make them pay their fair share of climate costs*.[6]

ATRA's recently updated "Super Tort" white paper describes the political, as well as financial, objectives of climate-change tort litigation as follows:

> The money trail and dynamics in these cases underscore the political nature of the litigation. By-and-large, the climate lawsuits are developed, funded and waged by environmental foundations who leverage them to exert political pressure on the oil and gas industry. Since 2004, these groups have provided grant money to lawyers and activists to circle the country recruiting governments to file lawsuits. (Of course, that hasn't stopped the lawyers from seeking 20-25%

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[5] Available at https://tinyurl.com/mvnjw4y7.

[6] https://tinyurl.com/4eka38e8 (last visited Aug. 27, 2025).

> contingency fees from the governments in case they win.) The foundations hope the companies will agree to the funding and public policies they want imposed if the litigation appears viable and media around the litigation damages their reputations.

ATRA, *supra*, at 8.

The Colorado Supreme Court's split decision presents this Court with a perfect and timely, indeed urgent, opportunity to decide whether federal law precludes state-law climate-change tort suits, and if so, to put an end to the swelling wave of tort litigation against the fossil fuel energy industry.

B. Petitioners' alleged liability for causing or exacerbating global climate change cannot be fragmented into myriad state and local pieces

1. The first sentence of the Colorado Supreme Court's majority opinion acknowledges that "this case presents issues of substantial global import." App-1a; *see also City of New York v. Chevron Corp.*, 993 F.3d 81, 88 (2d Cir. 2021) ("Global warming — as its name suggests — is a global problem . . . ."). But contrary to the majority's myopic legal analysis, the question presented by this case is anything but "narrow." *Id.* Instead, "Boulder's damages claims . . . are based on harms the State of Colorado has allegedly suffered as a result of *global* climate change." App-25a (Samour, J., dissenting). Like so many other pending climate-

change tort suits, this case is "entirely about addressing the injuries of global climate change and seeking damages for such alleged injuries." Mem Op. & Order at 11, *Mayor and City Council of Balt. v. B.P. P.L.C.*, No. 24-C-18-004219 (Md. Cir. Ct. for Balt. City July 10, 2024), *cert. granted*, No. 11-2025 (Md. Sup. Ct. Apr. 24, 2025) (dismissing City of Baltimore's climate-change tort suit as barred by federal law).

Respondents' complaint is replete with sweeping allegations that petitioners and other fossil fuel energy companies are responsible for "alteration" of the planet's climate. Am. Compl. ¶ 2. Here is a sampling of their expansive allegations:

- "Changes to the climate were caused, and continue to be exacerbated by, unchecked fossil fuel activities," *id.* ¶ 7;

- "Defendants spent decades producing, promoting, refining, marketing and selling fossil fuels . . . at levels that have caused and contributed to alteration of the climate without disclosing the dangers that continued fossil fuel overuse posed," *id.*¶ 14;

- "Defendants' fossil fuel activities have caused, contributed to and exacerbated the impacts of human-caused climate change . . .," *id.* ¶ 15;

- "Defendants are responsible for billions of tons of excess greenhouse gas emissions in the atmosphere," *id.*;

- "Earth has a natural 'greenhouse' effect [that] has been altered and intensified by the levels of Defendants' fossil fuel activities," *id.* ¶¶ 125, 126;

- "As a result of the emissions caused and contributed to by the levels of Defendants' fossil fuel activities, atmospheric CO_2 now stands at . . . a level which is unprecedented in human history," *id.* ¶ 129;

- Defendants' "fossil fuel activities caused and contributed" to "[w]arming of the climate system," including an increase in "annual average temperatures over the contiguous United States," and warming of the "atmosphere and oceans," *id.* ¶¶ 132, 133, 134 (internal quotation marks omitted); and

- "Defendants' fossil fuel activities accelerated, aggravated and continue to accelerate and aggravate the impacts of climate change," *id.* ¶ 326.

As respondents' own allegations confirm, there is nothing "narrow" about their claims.

2. Respondents' suit purports to be limited to global climate change-related property damage and other alleged harms within their, or Colorado's, geographic and political boundaries. *See* App-25a (Samour, J., dissenting) (Respondents' "damages claims are based on harms Colorado allegedly has suffered as a result of *global* climate change."). But this and similar climate-change tort suits that attempt to splinter fossil fuel producers' alleged liability into countless state or local pieces cannot be reconciled with at least two indisputable scientific facts: *First*, global warming due to greenhouse gas emissions and resultant climate

change are whole-earth phenomena that have no geographic or political boundaries. *Second*, there are a multitude of sources of carbon dioxide (CO_2) and other greenhouse gas emissions (including non-fossil fuel sources) both in the United States and abroad.

The U.S. Environmental Protection Agency (EPA) "serves as the Nation's 'primary regulator of greenhouse gas emissions.'" *West Virginia v. EPA*, 597 U.S. 697, 754 (2022) (Kagan, J., dissenting) (quoting *Am. Elec. Power Co. v. Connecticut* ("*AEP*"), 564 U.S. 410, 428 (2011)). EPA's website explains that climate change due to greenhouse gas emissions is a borderless, whole-earth phenomenon:

> The earth's climate is changing. Multiple lines of evidence show changes in our weather, oceans and ecosystems . . . . These changes are due to a buildup of greenhouse gases in our atmosphere and the warming of the planet due to the greenhouse effect. . . . "[G]reenhouse gases" . . . act like a blanket, making the earth warmer than it otherwise would be. This process [is] commonly known as the "greenhouse effect" . . . .

EPA, Basics of Climate Change;[7] *see also AEP*, 564 U.S. at 416 (describing the global greenhouse effect).

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[7] https://tinyurl.com/2f5bhwze (last updated Aug. 12, 2025).

"Since [g]reenhouse gases once emitted become well mixed in the atmosphere . . . [g]reenhouse gas molecules *cannot be traced to their source*, and greenhouse gases quickly diffuse and *comingle* in the atmosphere." *City of New York*, 993 F.3d at 92 (quoting *AEP*, 564 U.S. at 422) (citation modified) (emphasis added). Thus, regardless of any local or state-wide harm that respondents claim to have suffered, petitioners' alleged tortious conduct for causing or exacerbating climate change is necessarily *global* in scope.

EPA's website also explains that greenhouse gas emissions are not limited to fossil fuels: "Greenhouse gases come from a variety of human activities, including burning fossil fuels for heat and energy, clearing forests, fertilizing crops, storing waste in landfills, raising livestock, and producing some kinds of industrial products." EPA, Basics of Climate Change, *supra*. "Anthropogenic emissions of *non-CO_2 greenhouse gases*, such as methane, nitrous oxide and ozone-depleting substances (largely from sources *other than fossil fuels*), also contribute significantly to warming." S. A. Montzka et al., *Non-CO2 greenhouse gases and climate change*, Nature 476, 43-50 (2011) (Abstract) (emphasis added); *see also* Daniel E. Walters, *Animal Agriculture Liability for Climatic Nuisance: A Path Forward for Climate Change Litigation?*, 44 Colum. J. Env. L. 300, 303 (2019) ("The agriculture industry is responsible for a surprising amount of greenhouse gas emissions. . . . In the United States, the numbers are . . . stunning.").

Fossil fuels, therefore, are by no means the sole cause of respondents' alleged harm.

3. Given the borderless, multi-source nature of greenhouse gas emissions, global warming, and climate change, petitioners' alleged liability for causing or exacerbating global climate change cannot be divided into potentially tens of thousands of local bits and pieces of liability, each subject to the vagaries of one of 50 States' differing judicial systems and tort law standards. The interstate, indeed worldwide, scope of atmospheric greenhouse gas "pollution" cannot be reduced to a parochial dispute merely by pointing to the alleged damages that a local government claims to have suffered due to global climate change. *See generally Anza v. Ideal Steel Supply Corp.*, 547 U.S. 451, 466 (2006) (Thomas, J., concurring in part and dissenting in part) ("Proximate cause and certainty of damages, while both related to the plaintiff's responsibility to prove that the amount of damages he seeks is fairly attributable to the defendant, are distinct requirements for recovery in tort.").

The utter impracticality of climate-change tort litigation by local or state governments also is underscored, as discussed above, by the multiplicity of industrial, agricultural, and other human and natural sources of greenhouse gas emissions throughout the nation and world. Liability for the impacts of global climate change in Boulder, Colorado or any other locale cannot be attributed to any industry, corporation, individual, or other source of greenhouse

emissions. Insofar as any greenhouse gas emitter can be held liable for causing global climate change, then *every* greenhouse gas emitter must be held liable.

"Such a sprawling case is simply beyond the limits of state law." *City of New York*, 993 F.3d at 92. "[I]t is painfully obvious that, even though climate public nuisance cases are repeatedly filed around the country and courts in some states are allowing them to play out for years, climate change is not a liability question for state courts, but a complex global problem requiring a global, public policy-based solution." ATRA, *supra*, at 11.

C. Climate-change tort claims implicate uniquely federal interests that transcend state tort law and the geographic borders of any State, thus requiring a uniform federal rule of decision by this Court

1. Despite the Amended Complaint's lengthy, anti-climate change diatribe against fossil fuel producers, respondents pretend that their damages claims are not intended to regulate "any oil or gas operations in the State of Colorado, or elsewhere, or to enforce emissions controls of any kind." Am. Compl. ¶ 542; *see also* App-4a. This disclaimer, which presumably is an attempt to plead around federal preemption, is belied by respondents' introductory statement that they "bring this lawsuit against [petitioners] for the substantial role that their production, promotion, refining, marketing and sale of fossil fuels played and

continues to play in causing, contributing to and exacerbating alteration of the climate." *Id.* ¶ 2.

"[W]hat matters is the crux—or, in legal speak, the gravamen—of the plaintiff[s]' complaint, setting aside any attempts at artful pleading." *Fry ex rel. E.F. v. Napoleon Cmty. Schools*, 580 U.S. 154, 169 (2017). In his dissenting opinion here, Justice Samour recognized that respondents' "requested relief will inevitably impose a limitation on GHG emissions. An award of damages, just like abatement, can effectively exert[] regulation, no matter how the relief is framed or viewed." App-33a–34a (Samour, J., dissenting) (quoting *Kurns v. R.R. Friction Prods. Corp.*, 565 U.S. 625, 637 (2012)) (internal quotation marks omitted); *see also Riegel v. Medtronic, Inc.*, 552 U.S. 312, 324 (2008) ("[W]hile the common-law remedy is limited to damages, a liability award 'can be, indeed is designed to be, a potent method of governing conduct and controlling policy") (internal quotation marks omitted). "Make no mistake: Boulder looks to curb the energy companies' conduct by hitting them where it hurts—their wallets." App-34a (Samour, J., dissenting).

2. The true gravamen of respondents' complaint—petitioners' alleged liability under Colorado tort law for the localized physical effects of global warming and climate change due to widespread use of their fossil fuel products—implicates *uniquely federal interests*. *See* Pet. at 25; *see generally Texas Indus., Inc. v. Radcliff Materials, Inc.*, 451 U.S. 630, 640, 641 (1981) (discussing "uniquely federal interests [that] make[] it

inappropriate for state law to control"); *see also Boyle v. United Techs. Corp.*, 487 U.S. 500, 504 (1988) (same).

Here, respondents' claims unavoidably "implicate 'uniquely federal interests' . . . necessitating a 'uniform rule of decision,'" App-26a (Samour, J., dissenting) (citations omitted), because they "fall squarely within the principle that federal law governs claims seeking relief for interstate air and water pollution." Pet. at 25. Such a rule of decision—here, a rule that state-law climate-change tort suits are constitutionally precluded or statutorily preempted—would be impossible to enforce if each of 50 States' separate court systems has free rein to address the same federal question in multiple tort suits against the same fossil fuel energy companies.

3. Allowing Colorado state courts to adjudicate respondents' claims also would imperil "the principles of interstate federalism embodied in the Constitution." *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286, 293 (1980). "Each State's equal dignity and sovereignty under the Constitution implies certain constitutional 'limitation[s] on the sovereignty of all of its sister States.'" *Franchise Tax Bd. of Cal. v. Hyatt*, 587 U.S. 230, 245 (2019) (quoting *Volkswagen*, 444 U.S. at 293). This is "a limitation express or implicit in the original scheme of the Constitution and the Fourteenth Amendment." *Volkswagen*, 444 U.S. at 293.

Because climate change is a nationwide, indeed global, phenomenon, holding fossil fuel producers liable under Colorado's or any other State's tort law for causing or exacerbating global climate change would upset the balance of interstate federalism. Such a State (or political subdivision) would be using the State's tort law to exert its coercive power over the same major fossil fuel producers—and by so doing, make itself "more equal" than other States when imposing liability on, and seeking to regulate the lawful conduct of, those companies. *See Goodyear Dunlop Tires Ops., S.A. v. Brown*, 564 U.S. 915, 918 (2011) ("A state court's assertion of jurisdiction exposes defendants to the State's coercive power . . . ."). Preserving the constitutional pillar of interstate federalism thus is another compelling reason for the Court to address the question presented by this case.

CONCLUSION

The Court should grant the petition for a writ of certiorari.

Respectfully submitted,

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