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May 21, 2010

Nancy Sutley, Chair
Council on Environmental Quality
722 Jackson Place, N.W.
Washington, DC 20503

Dear Ms. Sutley:

At the annual meeting of the Western Governors' Association in June 2009, Western Governors adopted WGA Policy Resolution 09-2, *Supporting the Integration of Climate Change Adaptation Science in the West*. This resolution acknowledges the threat of global warming to the Western economy, public health and the environment and expresses a determination to develop adaptation strategies that will reduce the costs of climate change.

Consistent with that resolution, WGA recently established a Climate Adaptation Work Group. The Work Group includes representatives of Western states who manage air, forest, wildlife, and water resources in the West. The Work Group is developing a report that will include priority recommendations to help states develop climate adaptation plans. Our comments on the Progress Report come from the perspective of the WGA Climate Adaptation Work Group and they are submitted on behalf of WGA and state governors and their agency staff.

First, we commend the intent of the Task Force to coordinate and integrate climate adaptation activities across the federal agencies. Coordination will be essential to effective climate response. The WGA resolution states, "Western Governors believe that planning for climate change adaptation should be undertaken in a coordinated fashion at all levels of government with state expertise being fully utilized."

We support many of the themes that recur throughout the report. We highlight several here that are particularly important to Western states. First, the report recognizes the need to engage all sectors of the society, including not just the federal agencies but also states, tribes, local governments, and the non-profit and private sectors. The report acknowledges the need to work at the local level in recognition of the regional differences in climate change impacts. The report identifies the need to conduct research on the regional impacts of climate change and to provide that information in an accessible and usable form to on-the-ground decision-makers and practitioners. On this point, we emphasize the importance of basic data, including streamflow and snowpack data, in addition to new research and regional models. Basic data is absolutely essential to sound resource management in a changing climate.

We do have concerns that we would like to highlight going forward, primarily relating to the development of a 'national adaptation strategy.

1. States should be involved in the development of a national strategy. The Progress Report speaks repeatedly to the need for coordination, yet states and other stakeholders have been underrepresented in the process. We did comment in early listening sessions but we have not been engaged in the on-going efforts of the task force. WGA and state governors and their agency staff are encouraged by the commitment to develop a more rigorous and formal approach for coordination with states and other stakeholders.
2. A national strategy needs to recognize state efforts. While progress varies, many states are developing and implementing climate adaptation plans, including on-the-ground strategy implementation. A national strategy would need to recognize and respect these state efforts, and should seek to complement and support state (and local) programs. State-federal interactions should be incorporated into a 'flexible framework for (federal) agencies', which should address how federal programs can mesh with state and local efforts.
3. A national strategy should be scalable. A national strategy should be designed to converge on adaption planning processes and strategies at the proper temporal and spatial scales. The national scale will rarely be the right scale for adaptation strategies; more often, adaptation will occur at the scale of wildlife corridors, watersheds, air basins or forests. Similarly, some responses will occur over decades while others will require immediate actions. A national strategy will need to embrace flexibility and be responsive to different spatial and temporal scales. State and local partners will be essential to designing and implementing such a strategy.
4. A national strategy should support and fund state programs. Climate change adaptation, and the proliferation of new initiatives to address it, is straining state agencies and staff resources. Funding of state (and local) initiatives on climate adaptation would be one of the most valuable and essential components of a national strategy for adaptation.

We would cite the National Integrated Drought Information System (NIDIS) as one example of how federal agencies can work together and with states to deliver climate-related services to end-users of information. Several features of NIDIS stand out: it was co-developed by federal agencies and service users like Western states; it developed a single portal where information from a range of agencies is accessible to users; and it is beginning to implement pilot projects to provide services at the right regional or local scale. NIDIS is not perfect yet – we are still working to improve the system – but it demonstrates key elements of how federal agencies can work together and with partners to deliver actionable information to end users and decision-makers. We recognize that the challenge of developing a comprehensive national strategy for


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climate adaptation extends far more broadly than drought, but we point to key elements of NIDIS that could be incorporated in your strategy.

We urge you to engage Western states in the next steps in development of a national strategy, particularly in the regional outreach meetings and pilot activities. The scoping report of the WGA Climate Adaptation Work Group should be available at the end of June, and it should give you a good sense of the range of activities and priorities of Western states on climate adaptation. We would like to contribute to a national strategy for climate adaptation that meets the needs of Western states.

Thank you for the opportunity to provide comments on the recent progress report from the Interagency Climate Change Adaptation Task Force. We look forward to continued work on responding to climate change.

Sincerely,



Pam O. Inmann
Executive Director