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National Oceanic and Atmospheric Administration
1401 Constitution Avenue, NW
Room 5128
Washington, DC 20230

RE: Comments on Draft NOAA Climate Service Strategic Vision And Framework

Across the Western United States, we are experiencing the adverse impacts of climate change on our environment, infrastructure, economies and communities. We recognize the need to respond to these changes and to implement new management strategies to build a resilient West. We commend NOAA for its efforts to establish a NOAA Climate Service (NCS) and we welcome this opportunity to comment on NOAA's *Draft Vision and Strategic Framework* for the NCS.

In June 2009, we adopted Policy Resolution 09-2, *Supporting the Integration of Climate Change Adaptation Science in the West*. As called for in that resolution, we established a Climate Adaptation Work Group composed of Western state experts in air, forests, water and wildlife; in June 2010, we adopted the Scoping Report of the work group, *Climate Adaptation Priorities for the Western States*. Both the resolution and the report address the development of a National Climate Service.

Western states will be on the front lines of climate response. States – as well as tribes, local governments, and other stakeholders – need an authoritative source of information and tools to inform policy and management decisions. For these reasons, we call for the establishment of a National Climate Service “to undertake, coordinate, and communicate necessary research and modeling with respect to climate change and adaptation.” We offer the attached comments as one of the key users and beneficiaries of a coordinated climate service.

Sincerely,

Pam O. Inmann
Executive Director

Western Governors' Association

Comments on Draft NOAA Climate Service Strategic Vision and Framework

We appreciate NOAA's leadership in developing a NOAA Climate Service. We agree with your general definition of climate services: "easily accessible and timely scientific data and information about climate that helps people make informed decisions in their lives, businesses, and communities (p4)." We recognize NOAA's unique capacity and expertise in climate modeling and monitoring, and we appreciate NOAA's commitment to making information accessible to users on the ground, where adaptation will occur. We welcome the opportunity to comment on the draft vision and strategy and to work with NOAA to develop a climate service that truly 'serves' decision makers.

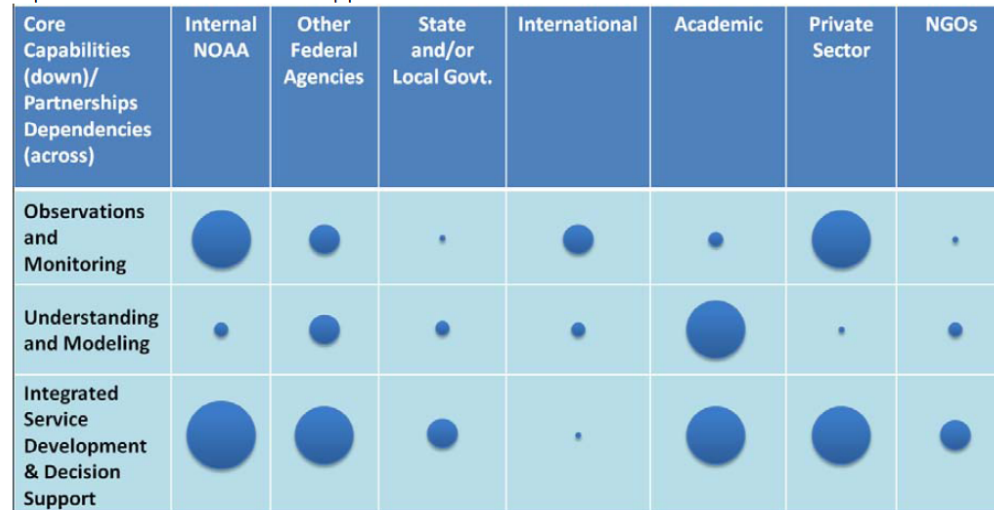
Coordinating with States

Most importantly, states, tribes, and other partners must have a role in developing a NOAA Climate Service. These are *the users* of a climate service: the entities that have on-the-ground management responsibilities and will be making decisions that will be informed by climate information. A NOAA Climate Service will be far more likely to effectively serve users – and succeed – if the users are involved in its development. We note that your list of 'consequences' of a climate service (p10) starts with 'a primary and authoritative source of information', but all of the rest of the benefits describe how the information is used to make decisions, for example in coastal management, natural resources, water supply and transportation infrastructure, and national security. We support this orientation towards informed decision-making.

Consequently, we are particularly interested in the set of services and objectives around the third of your three climate core capabilities: *Integrated Service Development and Decision Support*. The key aspects of service development include providing "decision-makers with timely and relevant climate information" and building partnerships between scientists and decision-makers to develop "a shared understanding of changing climate conditions and using those insights to inform adaptation decisions and climate policy. (p5)" The partnership between science and decision-making will be critical to the success and relevance of a NOAA Climate Service. We believe this is a *starting point* in the development of a climate service, not the last step or outcome of a fully-realized service.

We urge you to consider a greater investment in state and local governments with respect to the Integrated Service Development and Decision Support component of a NOAA Climate Service. Figure 3.3 in your report suggests a minimal investment in states with respect to this core capability, smaller than for academic or private sector partners and commensurate with that for non-governmental organizations. Yet states will be on the front lines of climate adaptation and have explicit responsibilities for planning and management decisions that should be informed by a climate service. NOAA should make a significant commitment and investment in state partnerships to provide a foundation for an effective climate service.

Figure 3.3. Current allocation of NOAA resources to support core capabilities. NCS will continue to support a broad array of partnerships to deliver its core capabilities. Circle size represents relative level of support.



That said, states also have an interest in ‘Observations and Monitoring’ and ‘Understanding and Modeling’. The states collect environmental data and have an interest and expertise in how it is used to understand the current and future state of the climate system. While we agree that our primary interest here is in the ‘Integrated Service Development and Decision Support,’ we note that these three capabilities must communicate with one another. Ultimately, the needs for services and decision support should help to drive the research and modeling priorities.

The NOAA draft strategy does speak repeatedly to the need for partnerships with states and other stakeholders in the development of the Climate Service. It acknowledges that a climate service “exceeds the scope of any individual organization,” that “a strong framework of partnerships is key to NCS success (p7),” and that a climate service will need to engage in “co-production of knowledge” with decision makers (p13).” We support this direction and look forward to working directly with NOAA to inform and develop an NCS.

NIDIS as an Example of State Coordination

The National Integrated Drought Information System (NIDIS) provides one example of how federal agencies can work together and with states to deliver climate-related services to end-users of information. The exceptionally dry years of 2000-2004 in the Colorado Basin and an extended drought since 1999 led the Western Governors to develop the pivotal report, “Creating a Drought Early Warning System for the United States (2004).” This report helped spur the NIDIS Act of 2006. NIDIS was developed in partnership with the Western states, but is national in scope. The goal, as stated in the NIDIS Act, is to “[e]nable the Nation to move from a reactive to a more proactive approach to managing drought risks and impacts.” To meet this goal, the Act prescribes an interagency and multi-state approach led by NOAA. Several features of NIDIS stand out, including:

- Engages users, such as Western states, in development of drought services;
- Maintains a single internet portal (www.drought.gov) where information from a range of agencies is coordinated and is accessible to users;

- Leverages existing capacity, system infrastructure, data and decision-support tools; and
- Implements early warning systems to provide information services at specific regional and local scales.

Recently, the Western Governors' Association and Western States Water Council convened a series of workshops to engage constituents and users in improving the effectiveness of NIDIS. While NIDIS is still evolving, it demonstrates key elements of how federal agencies can work together and with states and other partners to deliver actionable information to the public and decision-makers. NIDIS offers the nation a prototype for achieving its climate service goals by developing a successful federal-state partnership to provide authoritative information to support planning and management.

In addition, NIDIS should be integrated as a key component of a NOAA Climate Service. Drought and water supply impacts will be among the most immediate and significant impacts of a changing climate, and the NCS should be prepared to address them. We urge NOAA to describe how NIDIS will be incorporated into and enhanced by its relationship with the NCS.

Regionalizing Services

As a general matter, a climate service should be designed to converge on adaptation planning processes and strategies at the proper temporal and spatial scales. While global and national scales will at times 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 climate service will need to embrace flexibility and be responsive to regional scales and needs. It should also recognize existing state and regional efforts, including climate adaptation plans and on-the-ground strategies, and should seek to complement and support state and local programs.

One of the key lessons to date of NIDIS is that climate services should be regionalized. By this, we mean that effective services need to recognize the regional differences in climate impacts, management decisions, and legal regimes, and they should seek to work directly with local or regional stakeholders to understand the issues at play and to determine how best to provide a relevant 'service' to make climate-related decisions. Western states are calling for more investment in NIDIS regional drought early warning systems, as are under development in pilots for the Upper Colorado River and Apalachicola-Chattahoochee-Flint River Basins.

We note that NOAA's draft vision does reference the need for regionalization. "The National Climate Service Enterprise already brings together and strengthens internal NOAA and external partner regional activities and provides the institutional foundation for the NCS regional program." However, the strategy fails to elaborate on the structure or implementation of the regional program. In addition to NOAA supported efforts like NIDIS, the Regional Climate Centers, and the Regional Integrated Sciences and Assessments, NOAA should consider engagement of state climatologists in its effort to regionalize the NCS. We urge NOAA to address the regional program more fully in any revision to the draft strategy.

Coordinating with Federal Agencies

A climate service should be coordinated across federal agencies. We recognize that NOAA has unique expertise in climate monitoring and modeling. We do not disagree with the conclusion of the recent report of the National Association of Public Administrators on a NOAA Climate Service: “it would be extremely valuable, indeed the Panel considers this essential, to have one federal agency designated to be the center of gravity for aggregating and rigorously providing an authoritative roadmap or portal to the best available science that can be harnessed to support public policy decision making,” and that a NOAA Climate Service could be ‘uniquely qualified’ to serve as a lead federal agency on climate research and services (p3-4, NAPA).

But it will be important to coordinate with other federal agencies. Many federal agencies have expertise and information to contribute to a climate service; USGS and NRCS come to mind immediately but many others collect information that should be integrated into a service. More importantly, nearly all federal agencies will be affected by climate change, and they (like the states) will need a climate service to provide information to integrate a changing climate into their mission and management responsibilities. The climate response strategies of federal agencies – most significant to the West being the federal land management agencies, where decisions affect forests, wildlife, water supply, air quality, recreation and economies throughout the Western States – will clearly affect states and local governments. Decision-making information and processes will need to be integrated across federal, state and local levels.

The Department of the Interior’s regional Climate Science Centers and Landscape Conservation Cooperatives are one effort to promote informed climate response. These cooperatives will engage Interior and other and federal agencies, local and state partners, and the public to craft practical, landscape-level strategies for managing climate-change impacts across the country. We recognize the recent Memorandum of Understanding between the Department of Commerce and the Department of the Interior as a positive step towards coordinating the expertise and resources of your Departments. A NOAA Climate Service should articulate a relationship with other ‘climate service’ initiatives emerging in federal agencies. This will serve to reduce duplication and, perhaps more important to the states, will promote a coordinated federal front on climate response. As you know, state resource managers are already stretched, and coordinating with multiple federal initiatives can be a challenge.

We urge the establishment of an institutional structure for a NOAA Climate Service that reflects the need for federal coordination. An NCS should receive high-level support within NOAA, and there should be a mechanism for high-level engagement and coordination across all of the federal agencies. The NAPA report suggests one model: “The panel recommends that the Administration strengthen and expand interagency coordination structures...The panel recommends that the President empower a senior interagency group – led at the White House and convened at the Deputy Secretary or Secretary level – to provide the President annually with a strategic plan for management of federal climate research and service delivery (p2, NAPA).” In addition, we urge NOAA to consider how states and other decision-makers can be engaged in such a strategic planning forum for the NOAA Climate Service.

Identification of Five Societal Challenges

Given our emphasis throughout these comments on coordinating with states, federal agencies, and other partners in developing the NCS, we suggest that you consider waiting to identify your priority societal challenges. We agree that the five issues you have identified – water resources, coastal resources, marine ecosystems, weather extremes, and climate policy options – are important. In fact, several of these, like water resources, would likely be on our list of key issues. However, we believe that partners like Western states would be able to help to identify and prioritize key challenges, and that this list would be strengthened and legitimized by partner input.

Conclusion

WGA supports the establishment of a NOAA Climate Service, and we commend the leadership and work of NOAA to make the climate service a reality. We appreciate the opportunity to comment on NOAA's *Draft Vision and Strategic Framework* for the NOAA Climate Service.

The primary message of our comments: NOAA must engage directly with the states in the development of a Climate Service.

Ultimately, a NOAA Climate Service must be a true partnership, not just a 'service' that NOAA delivers with the hope that it will be embraced by decision makers. States will be among the primary *users* of climate service information to plan for and respond to climate change on the ground. We are seeking data, information, and tools to incorporate climate change into on-going state planning efforts for drought, water supply, forest management, agriculture, wildlife, and air quality. WGA will work to specify and prioritize the needs of Western states for climate services, ensuring that new tools and products are truly meeting needs on the ground. We look forward to working in partnership with NOAA in the development of a climate service that meets these critical needs.

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