

24 October 2002

Adm. James D. Watkins, U.S. Navy (retired)
Chairman, U.S. Ocean Policy Commission
1120 20th St. NW, Suite 200 North
Washington, DC 20036

Dear Jim:

Thank you very much for the opportunity to appear before the Ocean Policy Commission in Chicago on September 25. I was much impressed with the obvious engagement of the Commission members in the issues discussed by the panel on climate prediction, as well as the panel on education. I regret that I was not able to be present for previous panels. My compliments to you for your leadership, and to all of the Commission for the vigorous intellectual dialogue.

In accordance with your request, and that of Commissioner Coleman, I summarize below my remarks regarding "institutional arrangements," made in response to questions from several Commissioners. Having had some time to ponder those questions, I have in some instances added some further thoughts.

First, let me reiterate two general characteristics that I mentioned in Chicago: any change in institutional arrangements relating to observing, monitoring, assessment, and prediction of the earth's fluid environment

- _ must reflect the fact that the coupled ocean-atmosphere-land-ice system is, indeed coupled; and
- _ should ensure that the policy/regulatory functions have access to, but are separate from, the observing, monitoring, assessment, and prediction functions.

To these I would add the following:

- _ a single organization should have the lead role in observing, monitoring, assessing, and predicting the earth's fluid environment, and that should be its sole mission;
- _ this organization must serve other Departments and agencies, and must depend on them for a substantial portion of the observations, and therefore must establish effective cooperation/coordination procedures; and
- _ this organization must have a major international role, given that the coupled system is global.

Drawing upon these five statements, let me now reaffirm some of the statements I made in response to Adm. Gaffney's questions. The organization with the lead responsibility for observing, monitoring, assessing, and predicting the ocean-atmosphere-land-ice system would,

in my opinion, have three components: one would be responsible for observing the system, and the subsequent processing and archiving of the information. Second, there would be a services component providing predictions and other information about the system. Third, there would be a component for research in support of the previous two activities, and providing the assessment function. Taken together, these components should result in a coupled observing, monitoring, assessment, and prediction system which is dependable, accurate, effective, stable, and subject to continuous improvement.

I would propose that this organization should be an independent agency, as opposed to being a part of an existing Cabinet Department. Although several government agencies now deal with various elements of weather and climate and other aspects of the coupled earth system, none have the full responsibility for the coupled earth system as the sole or even a high priority. It is conceivable that a new Department of the Environment could have the requisite characteristics that I suggest above. However, if such a department included environmental regulation and enforcement responsibilities, extreme diligence would be required to provide administrative separation of the policy/regulation functions from the monitoring, service, and research functions. As Commissioner Sandifer put it to me after the meeting, we don't want the former telling the latter what monitoring and/or research results are needed to support regulatory decisions. Moreover, it would not be desirable for the policy/regulations function to dominate the others in budgetary or operational matters. The latter actually occurred in Canada, and it has resulted in serious weakening of the monitoring, service and research functions in Environment Canada.

Of course, there is much merit in the arguments of Commissioners Ruckelshaus and Rosenberg that regulatory functions require access to the best available science. However, there should be one place where monitoring, service, and research functions are performed without any actual or perceived influence from specific policy/regulatory viewpoints. It is self-evident that a clear and transparent separation between the policy/regulation functions and the monitoring, service, and research functions will add credibility to the activities of both functions.

I am copying Commissioner Coleman on this letter, since he made the original request. Should you, Commissioner Coleman, or any other member of the Commission have questions about either my original statement, or the elucidation provided in this letter, please feel free to contact me.

Sincerely,

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C: James A. Coleman