

EXECUTIVE OFFICE OF THE PRESIDENT  
OFFICE OF SCIENCE AND TECHNOLOGY POLICY  
WASHINGTON, D.C. 20502

January 22, 2008

The Honorable Daniel K. Inouye  
Chairman  
Committee on Commerce, Science and Transportation  
United States Senate  
Washington, D.C. 20510

Dear Mr. Chairman:

I write to express the Administration's views on S. 2307, "The Global Change Research Improvement Act of 2007." I appreciate this Committee's interest in climate change research, an issue that is a high priority for this Administration. While we welcome the opportunity to work with the Committee to update the Global Change Research Act of 1990, there are several objectionable provisions in S.2307.

Climate change science within the Federal R&D enterprise is currently coordinated by the Climate Change Science Program (CCSP), an interagency body led by the Department of Commerce. The CCSP integrates the U.S. Global Change Research Program (USGCRP), which was codified in the Global Change Research Act of 1990, and the President's Climate Change Research Initiative. The 13-agency CCSP is also the Subcommittee on Global Change Research, an interagency body under the management of the National Science and Technology Council Committee on Environment and Natural Resources. The CCSP, under the guidance of the CCSP Director and with the resources of an interagency CCSP Office, provides administrative support to this interagency effort. CCSP is closely coordinated with its parallel organization, the Climate Change Technology Program (CCTP), which is led by the Department of Energy.

The CCTP comprises research, development, and deployment efforts and a variety of voluntary partnership and grant activities that help to reduce, avoid, or sequester greenhouse gas emissions. The majority of the activities have the effect of stimulating the development and use of certain energy technologies including renewable, fossil, and nuclear technologies as well as energy efficient technologies, products, and process improvements. The CCTP helps ten Federal agencies strengthen their R&D portfolios and accelerate technology development toward this end.

The CCSP and CCTP function as parts of a larger organizational structure that was put in place by the President in February 2002 with his Climate Change Science Initiative. This overall structure includes a Secretary-level coordinating committee as well as a Deputy-level working group to which the Directors of the CCSP and CCTP report. Unfortunately, S. 2307 does not capture this holistic approach but instead focuses on the climate science infrastructure which is already defined. It is essential that we deliver better science in relation to global and regional climate change, and offer solutions for adaptation to mitigate its effects.

This organizational structure has proven effective and is worthy of incorporation into legislation. The Administration recommends the Committee use S. 2307 as an opportunity to advance the robust structure created by the President in 2002. Instead, the bill would establish a structure that largely mirrors the original statute enacted seventeen years ago. By reverting to the original structure and mission of USGCRP, the legislation fails to recognize the progress we have made in the last seventeen years, the growing complexity of climate change science, the important role of numerous Federal agencies, and sophisticated structure required to coordinate the management of climate change science and technology across the departments and agencies.

Budget coordination is an important component of an effective climate change research program. However, the budget coordination and review process described in this bill would violate the budget procedures of the Executive branch because they would require the disclosure of pre-decisional information that is not available for public review or determination prior to the official submission of the President's budget. In addition, it is more effective for budget coordination to be completed prior to the submission of individual agency budgets to the Office of Management and Budget.

Conveying a list of climate change research priorities from the Office of Science and Technology Policy (OSTP) to the National Science Foundation, as suggested in this bill, would only address a part of the total climate change research portfolio. More than 13 federal agencies conduct climate change research under the USGCRP, and any prioritization of research needs should be communicated to all participating agencies in a timely fashion so that all agencies may incorporate such guidance into their planning and budget process. In addition, while the Science and Technology Policy Institute (STPI) is an essential part of OSTP's resources, enabling OSTP to gather information quickly and thoroughly for targeted issues, STPI is not a government entity and is not used to implement any government program and should not be used to implement the USGCRP. A clarification is needed to distinguish between the objective technical/analytical and information-gathering role of STPI and the fundamental research functions of the science and technology agencies. It is not clearly stated in this section of the bill. The bill as drafted also provides funding for STPI through NSF; however, the FY 2008 omnibus appropriation (P.L. 110-161) transfers STPI to the OSTP budget. This legislation should be modified accordingly.

The purpose and functions of a National Climate Service described in this bill are desirable and the Administration supports the designation of the National Oceanic and Atmospheric Administration (NOAA) as the lead federal agency for operational climate monitoring and prediction. Most of the infrastructure and institutional capabilities required to fulfill the work of a National Climate Service currently exist, primarily within NOAA. NOAA elements including the National Weather Service's Climate Prediction Center and Climate Services Division, the National Climate Data Center, and university supported capabilities, such as the Regional Integrated Sciences and Assessments Program could meet most of the climate service functions outlined in the bill. Enhanced coordination and expansion of these elements is essential to synthesize and deliver information required by decision and policy makers at national, regional, and local levels. With this in mind, and given its distinctive observational assets, assessment and prediction capacity, and service delivery capabilities, the functions of a National Climate Service clearly require a leadership role for NOAA. However, the legislation should also include more explicit mechanisms for integrating Federal government capabilities for satellite and in-situ global observations, data collection and archive, modeling, data assimilation and computing that currently exist across numerous federal agencies.

In addition, the purpose of the National Climate Service, as described in Section 204 of the Manager's Amendment, could be interpreted to give NOAA the lead role in responding to, mitigating for, and adapting to climate change and climate variability. These responsibilities currently are shared by several agencies with management responsibility over Federal lands, waters, and other natural resources. The bill should be amended to clearly state that the role of the National Climate Service is to focus on operational climate monitoring and prediction in support of NOAA's mission, as well as in support of the mission of other federal agencies, states, and the private sector. Likewise, Section 206, which among other things would require NOAA to track greenhouse gas emissions, should be re-crafted to ensure that it comports with and supports other federal agencies' responsibilities. Finally, the proposed authorization levels are not only inconsistent with the President's funding recommendations for climate services, but also unrealistic given the institutional mechanisms for developing these services.

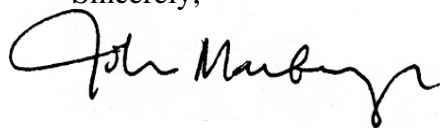
Study and anticipation of abrupt climate change are integral parts of the USGCRP. A separate program with separate authorization is unnecessary. In fact, specifying particular topical research areas based on today's circumstances should be avoided; research priorities change over time and the CCSP program should have the flexibility to respond.

Finally, S. 2307 would essentially repeat the reporting timeframes called for in the 1990 Act. Experience over the years has shown that these deadlines are not realistic, especially considering the many reporting activities that occur outside the requirements of the statute, such as the U.S. contributions to the Intergovernmental Panel on Climate Change and Scientific Assessment of Ozone Depletion. Again, and in order to ensure that reporting requirements on the agencies that participate in the CCSP do not ultimately impede the progress of the underlying science, the Administration would welcome a discussion of more appropriate and practicable timelines. Furthermore, the original reporting requirements of GCRA 1990 are not rescinded, so there remains some question about duplicating reporting requirements.

This Administration shares your interest in ensuring that a strong and well-coordinated climate change science program exists within the federal government. The organizational structure for climate change science and technology that the President put forth in 2002 has been highly effective. I look forward to working with this Committee to help ensure that any legislation on this subject reflects the existing structure and resource management responsibilities of the appropriate federal agencies and does not detract from its overall goals through increased reporting requirements.

Thank you for your interest in this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "John Marburger", written in a cursive style.

John H. Marburger, III

cc: The Honorable Ted Stevens