

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

December 3, 2007

The Honorable Daniel K. Inouye
Chairman, Committee on Commerce, Science, and Transportation
United States Senate
Washington, D.C. 20510-6125

Dear Mr. Chairman:

This letter provides the Administration's views on S. 2355, the *Climate Change Adaptation Act*. The Administration supports the intent of this legislation to enhance the ability of the United States to properly take into account climate change adaptation when developing and implementing programs and policies. As discussed in more detail below, however, we have serious concerns with several provisions of the bill and note that most of the tasks required under S. 2355 are or can be carried out under existing authorities.

The Administration recognizes the importance of understanding the impacts associated with climate change, of the necessity of incorporating adaptation strategies into the development and implementation of programs and policies, and of strengthening our ability to develop regional climate forecasts. The Administration's Climate Change Science Program (CCSP), a consortium of 13 participating federal departments and agencies, currently coordinates and integrates scientific research on climate and global change. This research helps federal agencies undertake efforts to ensure consideration of climate impacts within their programs and policies. For example, the Interior Department has created a Climate Change Task Force to study climate change and its possible effects on the management of wildlife and its habitat, national parks and other landscapes under its jurisdiction, as well as its responsibility to help moderate greenhouse gas emissions. Likewise, the U.S. Department of Agriculture's (USDA) Global Change Program Office coordinates agriculture, rural and forestry-related global change program and policy issues facing USDA. NOAA is coordinating regional climate information about water and drought information through the National Integrated Drought Information System (NIDIS), for regional coastal and ocean information through the Integrated Ocean Observing System, and finally providing regional information to local decision makers through the Regional Integrated Science and Assessments program (RISA). In addition, existing statutes require the use of environmental impact assessments, which account for natural and human changes to the environment in making management and policy decisions. Climate variability, such as drought, has long been a factor that has guided agency assessments and adaptive management tools are in wide practice today.

The Administration also recognizes the importance of understanding ocean and coastal impacts and adaptation. Developing accurate regional vulnerability assessments and useful regional adaptation plans requires, among other things, reliable climate forecasts. The National Academies of Science Synthesis Report and the CCSP Strategic Plan has acknowledged that, while great strides have been made in improving the accuracy of climate models, most regional climate forecasts contain a considerable amount of uncertainty. The effect of the mandates in sections 6(c), 7(a) and 7(b) would be to generate plans without a strong understanding of regional and local climate patterns.

In the absence of the ability to develop regional forecasts with adequate margins of error, we are concerned that developing these reports would divert resources away from effort to carry out NOAA's mission to develop the tools needed to create the regional assessments. Considering the analytical limitations of the field at this time, it is premature to require detailed vulnerability assessments and adaptation plans. In light of the complexity and scope of the climate change issue, the Administration would suggest that any legislation regarding the development of vulnerability assessments come in the form of guidance rather than prescription so that this and future Administrations can adapt to changing circumstances as appropriate. Any such legislation should also be thoughtfully coordinated with other legislation being considered that calls for other, additional assessments of various climate change topics.

The Administration appreciates the opportunity to present these views on S.2355. We welcome any questions and look forward to discussing these issues with the Committee in the future.

The Office of Management and Budget has advised that there is no objection to the transmittal of these views from the standpoint of the Administration's program.

Sincerely,

A handwritten signature in black ink, appearing to read "John Marburger, III". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

John H. Marburger, III

cc: The Honorable Ted Stevens, Vice Chairman,
Committee on Commerce, Science and Transportation
The Honorable Maria Cantwell, Chair,
Subcommittee on Oceans, Atmosphere, Fisheries and Coast Guard
The Honorable Olympia J. Snowe, Ranking Member,
Subcommittee on Oceans, Atmosphere, Fisheries and Coast Guard