THE WILDLIFE SOCIETY
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The Wildlife Society would like to thank you for the opportunity to submit comments on the interim progress report of the Interagency Climate Change Adaptation Task Force. The Wildlife Society (TWS) was founded in 1937 and is a non-profit scientific and educational association of over 9,100 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve wildlife professionals—the scientists, technicians, and practitioners actively working to study, manage, and conserve native and desired non-native wildlife and their habitats worldwide.

First, we applaud the Task Force for undertaking this effort to address climate change at the national level. Climate change poses an immediate and substantial threat to the healthy ecosystems that provide us with drinking water, flood protection, food, medicine, timber, recreation, scenic beauty, jobs, and numerous other services, as well as provide vital habitat for our nation's native wildlife. The nation must begin adapting to climate change in order to mitigate its potentially severe ecological, economic, and national security consequences. Given the far-reaching potential of this threat, it is becoming increasingly critical that a large-scale, coordinated approach must be undertaken to address it. The efforts of the Task Force make it clear that the Executive branch grasps the magnitude and seriousness of climate change, and is appropriately trying to define a role for the federal government in coordinating that challenge. We support the effort that has been made thus far and we make further suggestions for elements and ideas that are essential for a successful national adaptation strategy. Climate change is an urgent and ever-growing threat to our people, our environment, and our wildlife, and it is important that the nation quickly develops a policy to adapt to climate change now, before it becomes too late.

Science

We commend you for making science a primary element of this plan. As a scientific and educational society, TWS values science as a necessary tool to understand the natural world, supports the use of science to develop rational and effective methods of adaptation and conservation, and believes science should inform policy decisions that may affect wildlife and the environment. Science is the foundation upon which policy decisions about natural resources management and climate change adaptation must stand, and therefore it is appropriate that science plays a central role in the Task Force plan.

Because science will play such a central role in policy decision-making, it is important that significant effort be devoted to fostering climate science research and communication. One aspect that needs particular attention is dissemination of science to both policymakers and end-users. The connections between scientists and policymakers in federal agencies and between academic scientists and policymakers are in some cases tenuous and not well-established, and it is important as you go forward to devise ways to encourage more engagement from the scientific community. For politically-charged issues like climate change, fostering communication

between scientists and the policymakers will be an essential component of ensuring that all relevant science gets included in policy debates. Scientists in academia often hesitate to get involved in policy matters for fear of reprisal from their colleagues or home institutions if they are perceived as being politically-biased. A challenge for the Task Force will be to develop means for encouraging such scientists to communicate their findings on climate change adaptation research with the policy community.

Another issue that we believe is important to confront is scientific uncertainty. The science behind climate change tries to make best predictions from a series of rapidly-changing and stochastic observations. However, climate change is a dynamic process which humanity has not before witnessed. Therefore, there is some degree of uncertainty in all climate change predictions, and when using science to guide standard and best practices, it is important to acknowledge that although the science is uncertain and rapidly-changing, this in no way compromises the quality of the science or scientists. This also means that adaptation strategies must be formulated such that they are able to take uncertainty into account: they should be based upon the best available science, but written to be both flexible and precautionary.

Education and Training

TWS recommends the addition of an element entitled "Education and Training" to the plan. Climate science covers a broad range of sub-disciplines, from wildlife biology to hydrology to environmental chemistry, and coordination among all of these subfields and the emergence of climate science as its own field is still in its nascent phases. Education and training in this broader field of climate science must be recognized as a key element to a national adaptation strategy. We must prepare a new generation of scientists, engineers, and technicians who are able to develop creative and innovative approaches to respond to global climate change. Equally important, we must ensure that we have a scientifically-literate public by preparing them to understand climate change in such a way that can lead to informed, science-based responses to policy decisions.

In March 2010, the National Science Foundation announced that it was expanding its support for climate research by issuing five new interdisciplinary program solicitations, each of which is designed to encourage collaborative research and training on different aspects of climate change. One of these solicitations, the Climate Change Education Partnership, is intended to establish a coordinated national network of regionally- or thematically-based partnerships which will be devoted to developing large-scale, transformative, high quality educational programs related to the science of climate change and its impacts. As the Task Force continues to map out a national adaptation strategy, it will be important to support and develop this or similar programs so that the next generation of natural resource managers, scientists, engineers, and public will be able to understand and quickly respond to the challenges posed by a rapidly-changing climate.

Adaptive Management

The Task Force has outlined what we believe to be the most important aspects of a climate adaptation plan with the remaining elements of the plan. However, we would like to note that within element 5, a "Flexible Framework for Agencies", a policy of adaptive management both between and within agencies must be highlighted. Climate change is an ongoing and somewhat

random process that often defies accurate prediction. Therefore, as new data emerges, strategies for adaptation will have to be flexible and suited for rapid modification. This requires that the agencies and personnel tasked with implementing adaptation strategies are authorized to modify existing plans and responses on a relatively rapid time scale.

Monitoring

We urge you to consider highlighting the importance of a coordinated monitoring effort as part of the "Coordination and Collaboration" element of the plan. Establishing a coordinated national monitoring effort for climate change and its impacts will be integral to developing a coordinated, timely, and successfully adaptation strategy. Many aspects of a coordinated national monitoring strategy are already in place due to systems such as the National Ecological Observatory Network (NEON) and the USGS' Climate Effects Network, aa well as clearinghouses such as the USA National Phenology Network, however, it will be important that efforts such as this continue to receive adequate funding so that they can continue their important work; it will also be necessary that any centralized effort to coordinate climate change adaptation strategies be able to quickly and efficiently utilize information from such an effort.

Wildlife and Natural Resource Management

As you continue with the planning process, TWS recommends that you establish additional workgroups to handle the issues of wildlife and natural resource management. Currently, it appears that the only working group that is tackling natural resource issues is a water resource management working group. While water undoubtedly merits its own group, so do the myriad other natural resources that are affected by climate change, including forests, agriculture, grasslands, air, and wildlife. By failing to have a working group to address these other ecologically, economically, and culturally important natural resources, we risk them being overlooked as a national policy is developed.

Thank you for considering the views of wildlife professionals. We look forward to working with the Administration to develop an effective national policy for climate change adaptation that is flexible, based on science, and protects all of our treasured natural resources. If we can be of further assistance on this or any other matter, please contact Jenna Jadin, Assistant Director of Government Affairs at 301-897-9770 x309 or jenna@wildlife.org.

Sincerely,

Michael Hutchins, Ph.D.
Executive Director and CEO