



## THE WILDLIFE SOCIETY

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July 21, 2010

Attn: Vivian Daub, Director  
Office of Planning, Analysis, and Accountability  
Office of the Chief Financial Officer  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington DC 20460

Via fax to: (202) 564-1808

### **Re: Request for Comments on the FY2011-2015 EPA Strategic Plan**

Thank you for the opportunity to comment on the Draft Environmental Protection Agency (EPA) Strategic Plan for FY2011-2015. 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.

TWS values science as a necessary tool to understand the natural world, and supports the use of science to develop rational and effective methods of environmental protection and conservation, and to inform policy decisions that may affect natural resources, including wildlife and wildlife habitats. Science is the bedrock upon which management decisions must stand to responsibly conserve and sustain this nation's wildlife and ecosystems. President Obama noted the importance of science in natural resources management in his March 2009 memo on scientific integrity in the federal government, and we encourage EPA to keep in mind the role of science in natural resources decisions when finalizing this plan.

In the proposed framework, “Advancing Science, Research, and Technological Innovation” is one of five cross-cutting fundamental strategies, and we applaud the prominent place that you have given to science within the Plan. However, as is noted in the Plan, “EPA science and research must always inform the decisions that are essential to the protection of human health and the environment and empower the broader community that supports our mission.” **We urge you to not isolate science within this one section of the Plan.** To ensure that science plays a central foundational role in all actions that the EPA takes, it will be important to emphasize science more heavily throughout the Plan. Science will be key to supporting each of the five strategic goals, yet the role of science is not highlighted within each section. For example, in Goal 1 “Taking Action on Climate Change and Improving Air Quality” we recommend including the following points:

- Increasing the scientific capacity of the EPA to pursue further studies on the effects of climate change on humans, wildlife, and ecosystems, and working with those scientists to develop appropriate mitigation measures
- Using the best available science on air pollutants to develop and revise air quality standards, and communicating the results of this science clearly to the public

Likewise, in Goals 2-5, we recommend including similar language that calls attention to the science that is necessary to support each goal. For too long, the importance of science in policy decisions has fallen to the wayside, and it is only with continued emphasis on a scientific approach that it will be returned to its rightful place.

**It is also necessary that the Plan highlight transparency in the development and use of science.** The EPA makes important policy decisions every day that affect the lives of all U.S. citizens. The information supporting these policies should be available to the public, and the process used to make decisions should be transparent. The public deserves to be fully informed about resource decisions and to understand the role science plays in the decision-making process. In particular, they need to understand the potential consequences associated with particular regulatory decisions. As such, an emphasis must be placed upon scientific transparency throughout the document.

Another relevant component of scientific transparency is the presentation of all sides of an issue, whether or not it supports a desired outcome. On page 31, under the “Advancing Science, Research, and Technological Innovation” strategy area, the Plan notes that the “EPA must document our successes to maximize the value of our scientific work.” It is similarly important that **failures are documented** to have a truly transparent, open, and progressive scientific enterprise. In the past, EPA has been accused of suppressing scientific information on climate change; while such actions may or may not have actually occurred, it is nonetheless imperative to make a concerted effort to present all science, supportive of and contradictory to, future policy decisions in order to ensure that EPA science continues to retain its credibility.

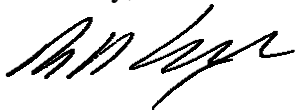
Within this same strategy area, TWS applauds the Plan for appropriately highlighting the importance of **trans-disciplinary science**. To meet 21<sup>st</sup> century challenges in science, EPA must invest in a mix of fundamental and mission-driven research. Our most challenging environmental problems are too complex to be solved by a single discipline or researcher; solutions to these problems will require a blend of disciplinary and interdisciplinary research. EPA should **work with other government agencies, non-governmental organizations, and universities to leverage expertise and resources to avoid duplication of effort**, and to ensure that EPA can access the natural, physical, and social science expertise required to address today’s complex interdisciplinary problems.

Finally, **the scientific capability of the EPA is also an important component of workforce development**. A well-trained scientific workforce is required to conduct research and monitoring, clean up our national lands and waters, and transform science into management policy. It is also critical that managers understand the role of science how and how it will be integrated into regulatory policy and implementation. EPA must contribute to a national effort to

recruit and train the next generation of scientists and environmental professionals. By investing in the next generation, EPA will help prepare students for quality careers and will ensure that the nation has a skilled environmental science workforce for coming decades. To continue to improve its science mission, the EPA should establish partnerships with other government agencies and non-governmental organizations, including professional and scientific societies and universities, to make wise education and training investments.

Thank you for considering the views of wildlife professionals. If we may be of further assistance on this or any other matter, please contact Laura Bies, Director of Government Affairs, at 301-897-9770 x308 or [laura@wildlife.org](mailto:laura@wildlife.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Leopold". The signature is fluid and cursive, with a large initial "B" and "L".

Bruce Leopold, Ph.D.  
President