



November 9, 2009

The Honorable Ken Salazar
Attn: DOI Strategic Planning Coordinator
Office of the Secretary, Planning and Performance Management
United States Department of the Interior
1849 C Street, NW, Mail Stop 5258
Washington, DC 20240-0001

Re: Request for Comments on the Strategic Plan Framework (74 Federal Register 46784)

Dear Secretary Salazar,

Thank you for the opportunity to comment on the Proposed Department of the Interior (DOI) Strategic Plan Framework for Fiscal Years 2010-2015.

The American Institute of Biological Sciences (AIBS) is a nonprofit scientific association dedicated to advancing biological research and education for the welfare of society. Founded in 1947 as a part of the National Academy of Sciences, AIBS became an independent, member-governed organization in the 1950s. AIBS is sustained by a robust membership of individual biologists and nearly 200 professional societies and scientific organizations with a combined individual membership exceeding 250,000.

Overall, the Strategic Plan Framework addresses many important issues facing the nation: climate change, water management, energy independence, and environmental stewardship. Meeting these challenges requires science. Research and monitoring conducted by DOI's United States Geological Survey (USGS) and other bureaus directly impacts the lives of every American every day. Whether monitoring drinking water, assessing threats from emerging wildlife disease, protecting biodiversity, or developing sustainable ecosystem management techniques, DOI science can and should play an important role in ensuring the health, safety, and progress of our nation.

As outlined in the proposed framework, "science in support of decision making" is a second tier priority, included in the mission areas of "protecting natural, cultural and heritage resources," and "sustainably using energy, water and natural resources." Although science is essential for wise resource management, the need for science within DOI goes beyond these areas.

In the new Strategic Plan Framework science should be a top tier, Interior-wide priority mission area. Science fuels innovation and supports decision making in many areas, such as protecting natural resources, adapting to climate change, empowering native communities, creating opportunities for youth, and building a 21st century Interior. Additionally, scientific

information can help build safe communities and create recreational and employment opportunities for current and future generations.

Please consider including the following priorities within a new, DOI-wide Science mission area:

- *Science-based management of natural resources*: Informed management of our nation's living and nonliving resources requires a strong foundation of science. Research and monitoring efforts at USGS, the Fish and Wildlife Service (FWS), and other bureaus provide the information required by public and private sector policy makers working to manage water resources, invasive species, emerging wildlife diseases, and recovery of protected species.
- *Preparing for climate change*: Although the resources of many federal agencies are required to predict, mitigate, and adapt to climate change, DOI has unique scientific resources and expertise to inform our response to climate change. For example, USGS conducts the science needed to understand how climate change will influence wildlife, terrestrial water resources, sea level, and carbon sequestration options. The FWS is charged with conservation of biological species, a mandate made more challenging by rapidly changing environmental conditions. The Bureau of Land Management and the National Park Service (NPS) manage environmental systems that provide vitally important ecosystem services, such as clean air and water, or carbon and nitrogen sequestration. To maintain these ecosystem services under rapidly changing environmental conditions, a robust investment in scientific research is required.
- *Workforce development*: A well-trained scientific and natural resources management workforce is required to commission and conduct research, educate visitors to public lands, and transform science into management policy. DOI must contribute to a national effort to recruit and train the next generation of scientists and natural resource professionals. Currently, DOI contributes to this effort via the USGS Cooperative Research Units, which partner with academic institutions around the country to educate graduate students and provide continuing education to natural resource professionals. By investing in the next generation of scientists, DOI will help prepare students for quality careers and will ensure that the nation has a skilled natural resources management workforce for coming decades. In addition to existing efforts, a DOI-wide science mission should help establish partnerships with other government agencies and non-governmental organizations to make wise education and training investments.
- *Expanding access to scientific collections*: DOI is a caretaker for a significant share of our nation's biological, geological, and cultural heritage assets. NPS has an estimated 121 million specimens and artifacts, and USGS has 86 separate scientific collections. These collections are more than records of our past. These collections, which are irreplaceable data, contribute to cutting edge research on emerging diseases, biodiversity, and climate change. The revised framework should include plans for DOI to inventory, protect, and enhance access to these scientific collections. Moreover, DOI should work with non-governmental science collections managers and scholars to ensure that federal and non-federal scientists can effectively and efficiently share resources and information to advance research, education, and stewardship.
- *Science for the 21st century*: To meet the Department's new mission areas and goals, DOI must invest in a mix of fundamental and mission-driven research. As some research may

be accomplished more rapidly and efficiently by external scholars, DOI should increase the amount of extramural funding for research. This funding should be awarded via competitive, peer-reviewed grant programs. Additionally, several recent reports, including the National Academies' "A New Biology for the 21st Century" and the National Science Foundation's "Transitions and Tipping Points," have highlighted the need for cross-disciplinary science in the coming century. These reports argue that 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. DOI should work with other agencies to leverage expertise and resources to avoid duplication of effort, and to ensure that DOI can access the natural, physical, and social science expertise required to address 21st century problems.

Thank you for your thoughtful consideration of these comments. If we may be of further assistance on this or any other matter, please contact Dr. Robert Gropp, AIBS Director of Public Policy at 202-628-1500.

Sincerely,



Richard T. O'Grady, Ph.D.
Executive Director