

Summary of Invited Written Comments: Draft NOAA CDR Strategy

NOAA received written comments on the Draft CDR strategy from 7 invited persons or organizations (see Appendix A). The comments were parsed into 97 separate items in an Adjudication Table in Google Sheets to facilitate resolution. Each comment was recommended for either “No Action” or “Action,” i.e., possible revision or addition to the current draft.

Table 1. Summary of invited written comments received

| Type of Comment | | Totals | No Action | Action |
|-----------------|--|------------|-----------|------------|
| Complimentary | <i>Supportive, endorses or agrees with Strategy, does not require revisions.</i> | 11 | 11 | 0 |
| Minor | <i>Suggested addition(s) that clarifies key points, or correction/revision to factually incorrect material</i> | 91 | 8 | 83 |
| Substantive | <i>Introduces new or expanded scope or content that may cause non-concurrence with current Strategy goals/objectives</i> | 57 | 9 | 48 |
| Critical | <i>Contentious issue or topic that potentially conflicts with the purpose or objective of the Strategy</i> | 6 | 6 | 0 |
| TOTALS | | 165 | 34 | 131 |

All invited written reviews provided relevant input with clear references to various elements of the strategy. Most comments (102) were either complimentary of the strategy or assess minor content changes, such as typo corrections. 57 comments suggested substantive changes, which were assessed for relevance. Six critical comments either recommend or imply the extension of NOAA's role in the CDR space beyond what is currently supported by the agency's congressional mandate.

Highlights of Recommendations for Action

- The Draft NOAA CDR Research Strategy does not adequately describe NOAA's potential partnerships in CDR research.
 - *25 written comments total concerned this issue.*
 - *Example comment: “NOAA has a track record of partnering to multiply its impact. There's a few partnerships alluded to in the draft strategy, but as one of the first federal movers on the topic, NOAA should be more explicit in the research strategy about what types of partnerships with other agencies or civil society organizations are going to be necessary.”*

- **RECOMMENDED ACTION:** Add a discussion of NOAA's partnerships to Part IIV, emphasizing federal partnerships and public-private partnerships, emphasizing knowledge transfer, inter-agency support of shared missions, funding opportunities, and justice.
- The Draft NOAA CDR Research Strategy does not address NOAA's potential role in Monitoring, Reporting, and Verification (MRV) standardization.
 - *10 written comments total concerned this issue.*
 - *Example comment: "It could be helpful to have to a consolidated section highlighting the difficulties of marine-based MRV."*
 - **RECOMMENDED ACTION:** Add a breakout box describing MRV practices, offering some basic definition of terms, and describing key challenges in the MRV space as they relate to NOAA's mission.
- The Draft NOAA CDR Research Strategy lacks a conclusive ending.
 - *2 written comments total concerned this issue.*
 - *Example comment: "The document ends rather abruptly."*
 - **RECOMMENDED ACTION:** Add a concluding statement highlighting NOAA's potential, including references to the key findings found in the Executive Summary.

Highlights of Recommendations for No Action

- The Draft NOAA CDR Research Strategy highlights NOAA's potential leadership and assets, but does not emphasize the specific leadership role NOAA will play.
 - *6 written comments total concerned this issue.*
 - *Example comment: "Great that NOAA is getting into the game here, but disappointing that a greater leadership role in mCDR is not taken."*
 - **NO ACTION RECOMMENDED:** NOAA's role in CDR research must be responsive to the agency's mandates and authorizations.
- The Draft NOAA CDR Research Strategy emphasizes the need for many research activities and field trials, but does not outline a plan to implement this work.
 - *4 written comments total concerned this issue.*
 - *Example comment: "There is no grand vision or organizing/hosting and supporting field R&D. I also sense the need for greater integration of ocean chemistry/physics with eco/bio in providing an integrated, full service platform for evaluation of mCDR field R&D at local/regional scales."*
 - **NO ACTION RECOMMENDED:** Specific actions are more appropriate to an implementation plan rather than a research strategy, and are out of scope.

Appendix A: Sources of invited written review comments (number of comments submitted):

1. Sarah Cooley, Ocean Conservancy (34)
2. Hedy Edmonds, NSF (22)
3. Debora Iglesias-Rodriguez (17)
4. Amishi Kumar, DOE FECM (32)
5. Sena McCrory, EPA (9)
6. Greg Rau, Planetary (15)
7. Carrie Schmaus, DOE WPTO (36)