

Summary of Public Verbal Comments: Draft NOAA CDR Strategy

NOAA received written comments on the Draft CDR strategy from 18 persons or organizations during three listening sessions (see Appendix A). Comments were limited to two minutes per speaker unless extra time in the session was identified. Transcripts of these comments were parsed into 38 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>	12	12	0
Minor	<i>Suggested addition(s) that clarifies key points, or correction/revision to factually incorrect material</i>	5	1	4
Substantive	<i>Introduces new or expanded scope or content that may cause non-concurrence with current Strategy goals/objectives</i>	17	8	9
Critical	<i>Contentious issue or topic that potentially conflicts with the purpose or objective of the Strategy</i>	0	0	0
Comments	<i>Non-actionable discussion items shared during a listening session, including references to content shared by other commenters.</i>	4	4	0
TOTALS		38	26	12

17 comments were either complimentary of the strategy or assess minor content changes, such as typo corrections. 17 comments suggested substantive changes, which were assessed for relevance. 0 critical comments either recommended or implied the extension of NOAA’s role in the CDR space beyond what is currently supported by the agency’s congressional mandate. 4 comments were classified as non-actionable discussion, including direct discussion between commenters that did not involve the draft research strategy.

Highlights of Recommendations for Action

- The Draft NOAA CDR Research Strategy does not adequately describe NOAA’s potential partnerships in CDR research.
 - *11 verbal comments total concerned this issue.*

- *Example comments:*
 - *“I would encourage NOAA to explore ways to effectively engage communities around this research.”*
 - *“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.”*
 - *“We need to ensure that those who are directly impacted, mostly impacted, Indigenous communities, are at the forefront of engagement with these large-scale, risky forms of testing and manipulation of Earth systems.”*
- **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.

Highlights of Recommendations for No Action

- The Draft NOAA CDR Research Strategy lacks a coherent description of NOAA’s role in CDR governance, including carbon accounting and ecosystem protection.
 - *7 verbal comments addressed this issue.*
 - *Example comments:*
 - *“[The strategy referenced] taking the carbon dioxide out of the system, but not, from a climate point of view, the accounting, the governance.”*
 - *“One of the things I was wishing [the draft strategy] had more of was an assessment of risk versus reward for the various options.”*
 - **NO ACTION RECOMMENDED:** Specific actions are more appropriate to an implementation plan rather than a research strategy, and are out of scope.
 - The Draft NOAA CDR Research Strategy does not outline a concrete plan for field trials of the mCDR methods described.
 - *3 verbal comments total addressed this issue.*
 - *Example comment: “We wanted to reinforce the comments of others, that the field trials are an absolute necessity. In addition to extensive laboratory experimentation, the field trials is the only way to really get a sense of effectiveness and potential broader ecosystem impacts of these technologies. We’re in favor of the field trials.”*
 - **NO ACTION RECOMMENDED:** Specific actions are more appropriate to an implementation plan rather than a research strategy, which is the purview of the current document.
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Appendix A: Sources of public verbal review comments (number of comments submitted):

1. Brad Ack, Ocean Visions (2)
2. Sarah Cooley, Ocean Conservancy (5)
3. Carole Douglis, freelance environmental journalist (1)
4. Drew Felker, Carboniferous (1)
5. Michael Hayes, commercial fisherman and aquaculturist (3)
6. David Koweek, Ocean Visions (1)
7. Andrew Lockley, University College - London (1)
8. Mary Miller, Advisory Council for the Greater Farallones National Marine Sanctuary (1)
9. Peter Ravella, Project Vesta (3)
10. Jaime Palter, University of Rhode Island (2)
11. Panganga Pungowiyi, Indigenous Environmental Network (2)
12. Sarah Schumann, Fishery Friendly Climate Action Campaign (3)
13. Volker Sick, Global CO2 Initiative at the University of Michigan (2)
14. Lisa Suatoni, National Resources Defense Council (3)
15. Ben Swainbank, Oceanid MRV (1)
16. Phil Williamson, Essex University - East Anglia (4)
17. Kevin Wolf, Wind Harvest International (2)
18. Kristen Yarincic, IOOS Association (1)