



Sea Grant Association

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Donald Scavia, Acting Chair
NOAA Research Council
1305 East-West Highway
Silver Spring, MD 20910

Dear Dr. Scavia:

Thank you for the opportunity to comment on the NOAA Research Council's recommendations to NOAA regarding NOAA's commitment to spend 50% of new research funds throughout the external community.

SGA welcomes the development of the 50% rule within NOAA and we believe that this is a positive step for the agency. The merit of this approach to funding research is that it is collaborative, builds partnerships and extends the research technology into coastal and Great Lakes communities where it can be implemented. This process builds capacity, creates a better informed citizenry and involves the nation's universities and state governments which provides for a better foundation for federal government management and policy.

We believe that some ground rules and prior definitions will go a long way to helping shape this new NOAA approach.

First, NOAA needs to develop an agency-wide research agenda. This should include significant input by extramural partners in defining strategic research goals and priorities. Through this exercise, NOAA should also address the roles and relationships of scientists and researchers in both the extramural and NOAA communities.

Second, NOAA needs to clarify its definition of what constitutes "new" dollars. This should include a clear baseline that specifies how much NOAA currently spends on research and the process that will be used in defining "new" dollars. In addition, NOAA should identify the role of cooperative institute funding and whether it will be counted as "new" money. The definition of "new research funds" and the transparency of the process that leads to this definition are key to the success of implementing the intentions of this new rule.

Finally, all NOAA partners, internal and external, need to be held to the same outcome and performance measures.

Thank you again for the opportunity to comment. We remain committed to working with you and the NOAA leadership on this and other important efforts.

Sincerely,



for

Robert R. Stickney
President

cc: SGA Membership
Jennifer Greenamoyer, SGA Director of External Affairs
Ron Baird, NSGCP Director
Richard Rosen, OAR AA