March 5, 2015

Dear Lauri,

Thanks for the opportunity to comment on your draft amendment to SB 202. While it feels somewhat awkward to be entering the discussion at the eleventh hour, we were not informed this legislation was being drafted until just a few days before the Jan. 15 workshop. We hope bringing both our own experiences and those of the workshop participants in independent science review is helpful, even at this late date.

In a nutshell, our advice can be boiled down to three suggestions: *1) don't reinvent the wheel, 2) fix the real problems, and 3) ensure the "independence" piece of independent science review*. In the draft amendment, this seems most easily accomplished by directing the IMST and INR to jointly convene an independent task force whose job would be to figure out how to address or implement the recommendations that came out of the Jan. 15 workshop (which also touch on many of the subparagraphs of Paragraph 3 of your amendment). Recognizing you need a "get it done" component, INR could be retained (i.e., funded) to provide organizational, logistical and administrative functions for the taskforce. Having the IMST be a co-convenor adds the critical elements of extensive experience with science reviews, of operational independence, and of a broader aspect of task force membership than simply the higher education community.

Don't reinvent the wheel. Any new legislation should build on the 18 years of experience Oregon already has with independent science review. When the IMST statute was enacted in 1997, GNRO had scientifically trained professional staff develop the original foundation for the IMST, and a 7-member Team of senior, practicing scientists spent a year developing an optimal review system. Over the next decade and a half the IMST has fine-tuned various parts of review processes. Most recently, the January 15, 2015 workshop produced a comprehensive report and specific recommendations for moving to the next iteration of independent science review. The workshop engaged some of the best experts available on this topic across Oregon, and it is not likely that anything significantly better would come from a new taskforce.

Furthermore, starting the discussion from scratch instead of using the workshop recommendations as a starting point would waste a huge amount of time and money (especially if not informed by what *hasn't* worked well, see "Solve the real problems" below!), could probably not be completed in the 9 months specified in the amendment, and would likely delay the time of startup for the new science review board by years.

As an important side note, university administrators and their staff do not necessarily know who the best people are to appoint to an independent science review task force (e.g., those with appropriate experience, those that know the science needs for Oregon, and those that have no personal conflict of interest).

March 5, 2015

Solve the real problems. This suggestion goes along with: if it's not broken, don't fix it. The main problems with the IMST model have related to the selection and appointment of new members, and to the decreased ability to interact with natural resources issues and agencies after the demise of the Core Team. Because the IMST has had a very strong charter and operating guidelines, the actual science review functions have worked well. The recommendations from the Jan. 15 workshop provide some valuable ideas for the task force regarding team member selection and interaction with state natural resources agencies, and to build on those recommendations could result in substantive improvements.

Independence. IMST has a large amount of documentation of discussions about independence, dating from the inception of the team. Independence has been at the forefront of our mission, and maintaining it has been one of the key successes of IMST. This understanding of independence and what it looks like in science review is critical to framing a new and improved model.

The role of INR as outlined in the draft amendment could be viewed as stepping away from that independence. INR does quality work, and hopefully will play a key role in future science reviews. However, because of the way oversight occurs for INR, it is not truly independent. INR is structured as an OUS entity, operates under University supervision (which could be viewed as subject to political and financial influences) and is guided by a board of advisors, which includes members of special interest groups. It does not have the ability to self-initiate reviews or reports, but responds to the needs or requests of funding entities. In addition, INR's pool of science expertise does not include federal and state agencies, tribes and NGOS, which have some of the top experts in some fields, and whom the State would want included in reviews. That said, elevating the "doing" role of INR in carrying out science reviews, perhaps as adjunct to or under the auspices of an independent science group is an idea that may have considerable merit.

(Note: To summarize the disparate roles of INR and IMST, INR functions as a group of "in-house" scientific experts with an emphasis on providing *products*, and IMST serves as an independent group of scientific experts with an emphasis on providing impartial *advice* that includes an "out-of-house" perspective, and allows for minority viewpoints and differences of opinion. The table below, developed a few years ago during discussions with INR about working together, has some more details).

IMST	**INR**
By statute: focus is on Oregon Plan and other salmon and stream enhancement programs in the state	Broad focus on natural resources in Oregon
By Statute: Agencies must respond to recommendations made by IMST	Formal responses to recommendations not required
Scientists appointed by Gov., Speaker of the House, Senate President – from universities,	Scientists chosen and paid for specific projects- from universities (primarily),

March 5, 2015

federal agencies, private consultants	federal or state agencies
Scientists appointed for 4-year (potentially renewable) staggered terms to provide continuity; ad hoc scientists appointed as needed	Scientists appointed ad hoc as needed.
Maintains a separation of science and policy	Bridges science, policy, and decision-making efforts
Workload: by request and self-generated	Workload: by request
Does not generate new data	Can generate new data
Has base funding – Line item in OWEB's budget	Soft funded, each review needs to be funded by outside sources
Main contact: Governor's Office but also key legislative committees	Main contact: Governor's Office; OSU's Research Office; OUS
No Board of Advisors	Has a Board of Advisors

We hope these ideas and suggestions are helpful. Please keep us in the loop regarding next steps for this important piece of legislation (and thanks in advance for doing so).

Best regards,

Carl Schreck

Nancy Molina

Bob Hughes

Alan Yeakley