OMB TRANSPARENCY IN REGULATORY SCIENCE October 16, 2020

Gary E. Davis, USNPS (ret.)
Co-Editor
The Photographer's Frame—Visual Essays
Parks Stewardship Forum
204 Los Padres Drive
Westlake Village, California 91361
805.497.7652
gedavis204@gmail.com
http://www.gedapix.com
https://parks.berkeley.edu/psf

1-min intro:
• I trained in fisheries and marine ecology in San Diego, CA in the 1950s and 60s;
• Conducted research in Virgin Islands and South Florida national parks in 1960s and 70s on coral reefs, spiny lobsters, stone crabs and sport fisheries;
• Developed park vital signs monitoring protocols for guiding and tracking stewardship at California's Channel Islands NP in 1980s, and helped expand that protocol to 32 networks of scientists serving 270 parks in the 90s;
• In the 2000s, I served as a science advisor for ocean parks and marine sanctuaries, and on the National Parks Advisory Board science committee.
• I have produced, used, and evaluated scientific findings for policy and regulatory use in the federal government for a little over 50 years.
• Currently, I co-edit a visual essay feature of the journal Parks Stewardship Forum at UC Berkeley's Institute for Parks, People, and Biodiversity, and speak today on behalf of the Coalition to Protect America's National Parks.

5-min statement of concern regarding proposed transparency in regulatory science rule:
• It's no secret that people love national parks; parks seem to glow with an aura of nostalgia and fond memories of family, nature, and history.
• While that's true, there's more…
• I think of parks more as movies of our possible futures than as snapshots of our past.
• America's 421 national parks are the last, best places for us to learn how nature works and to discover our multiple heritages.
• These most protected places on land and in the sea are benchmark systems for understanding nature and seeing what is possible in the future.
• Science has become a guiding principle of park stewardship in the late 20th century.
• The earliest national park management relied on beliefs; so forest fires were quickly extinguished, predators were removed to "protect" wildlife, pelican eggs were crushed to leave more trout for visitor fishing in Yellowstone Lake— all to the detriment of park ecosystem integrity and health.

- Science has revealed the power and necessity of fire and predators to shape and sustain nature in parks, and by extension elsewhere.
- Current policies and regulations to conserve parks unimpaired are based on knowledge developed by science and guided by continuing research.
- The proposed rule inappropriately equates "raw data" with science and scientific findings.
- Science is a process for learning how things work.
- Scientific findings which inform regulations are the result of hypothesis formulation, experimental design, and analysis which produces clarity and transparency.
- Raw data alone may obscure findings, only the science process yields transparency.
- Raw data and observations are no more science than a carton of eggs and a bag of flour are a soufflé.
- Raw data divorced from hypotheses, design, analysis, and context hinder understanding, sow disinformation and unsubstantiated doubt, and misdirect analytical focus, which are all goals of tricksters and magicians.
- This rule does not appear to improve transparency, regulations, or science—but looks like an attempt to shift the cost of environmental damage from private polluters to public tax-payers.
- It appears to be no different from the failing campaigns of the tobacco and petroleum industries and others to denigrate facts and merchandize doubt for the past 50 years and more.

Questions:
1. Have you considered the costs of revisiting the science findings that underpin current park stewardship policies and practices that would be vulnerable to rejection and nullification by the additional regulations for science transparency under the proposed rule?