



# Public Employees for Environmental Responsibility

962 Wayne Avenue, Suite 610 • Silver Spring, MD 20910

Phone: (202) 265-PEER • Fax: (202) 265-4192

Email: [info@peer.org](mailto:info@peer.org) • Web: <http://www.peer.org>

November 17, 2016

## **PEER Comments on Director's Order #100 - Resource Stewardship for the 21st Century**

Public Employees for Environmental Responsibility (PEER) opposes the adoption of Director's Order #100 "Resource Stewardship for the 21<sup>st</sup> Century."

By way of overview, it should be noted that the National Park Service did not issue a press release or other publicized announcement seeking public input on this proposal despite the claim that it constitutes a comprehensive stewardship purporting to govern all "policies, plans, studies, and inventories; funding priorities and allocations; and field operations and programs" for both natural and cultural resources throughout the entire park system. This deliberate low-ball approach appears to be an attempt to avoid scrutiny of this misguided very lame duck plan.

Our specific concerns about this proposal include:

### **I. Proposal Is Incurably Vague**

The draft of Director's Order #100 is full of lofty but nebulous terms, crammed into a mish-mash of confusing and largely unexplained precepts. Nonetheless, it claims to advance "a new framework for stewardship decision making" based on wholly "new conservation concepts and guiding strategies."

None of these fundamental changes are coherently explained, however. For example, the proposal posits as one of the three central pillars of National Park Service (NPS) decision-making a construct called the "long-term public interest" which it defines as –

“an evolving understanding of diverse public values and perspectives, meaningful civic engagement including multiple perspectives and generations, and the professional judgment of NPS professionals.”

What does that mean?

It appears to be an attempt to invoke as much politically correct jargon as can fit in 18 pages. It provides no useful guidance to NPS planners.

### **II. Proposal Advances Conflicting Concepts**

The proposal contains contradictory mandates for NPS planners, such as –

- Adopting "the precautionary principle" but using ad hoc, less than precautionary "adaptive management" as its implementation strategy;

- Vowing to “preserve and restore ecological, historical and cultural integrity” while doing so “in a context of continuous change that we do not fully understand.” In this case the conflicting ideas are couched so as to defy explanation; and
- Pledging “accurate fidelity to the law” (whatever “accurate fidelity” means) while allowing departures in the “long-term public interest” as determined by NPS managers.

In short, this proposal is a jumble of clashing ideas lacking any coherence.

### **III. Proposal Mandates Ill-Conceived Injection of Indigenous Lore into Scientific Reviews**

In several of its provisions, the proposed DO states that resource management must be based on “rigorous” science-based decision-making. It also would promote “scientific literacy” among all NPS superintendents.

At the same time, the proposed DO mandates reliance upon indigenous lore in decision-making. It would enshrine deference to “traditional ecological knowledge” (or TEK) from NPS planners yet does not explain how this would be done. For example –

- What happens in the event of a conflict between findings of peer-reviewed science and TEK?
- Who referees a conflict between differing tribal lore about the same resources?
- Since most TEK is unwritten and based on oral traditions, are NPS employees charged with reducing it to writing? If not, how is the agency supposed to act on unwritten guidance?
- Much of TEK is rooted in non-linear causality of tribal spiritual beliefs. How are NPS employees supposed to act on TEK without adopting the world-view that is the basis of this knowledge?
- TEK advocates describe it as a “different way of knowing.” Who then teaches TEK and the distinct epistemology that goes with it to NPS managers?

In short, this attempted shot-gun marriage of Western science to native traditions is poorly thought-out and fraught with unresolved practical difficulties.

### **IV. Proposal Detracts from Neglected Park Planning**

It is more than ironic that this proposed DO addresses resource planning, yet it makes no mention of statutorily required resource planning that NPS has utterly neglected in recent years. Despite a nearly forty-year statutory requirement that every unit of the National Park System have a current general management plan, a majority of major parks do not. As a result, most parks lack overall guidance on budgetary priorities, visitor safety or wildlife protections.

By law since 1978 under the National Parks and Recreation Act, every national park unit is required to have a current general management plan; each plan has a lifespan of up to 20 years.

Those plans are supposed to spell out “measures for the preservation of the area’s resources,” steps for addressing challenges posed by transportation and infrastructure needs, as well as means for maximizing visitor enjoyment.

PEER examined all 59 National Parks, 19 National Preserves, two National Reserves, 18 National Recreation Areas, and 10 National Seashores in the 411-unit system. Of these 108 major units, only 51 have current general management plans. Several prominent parks, such as Grand Canyon, Yellowstone and Yosemite, either have no plans or have plans that are more than two decades old.

That law also requires that the general management plans prescribe “visitor carrying capacities for all areas” of each park unit. However, almost no major national parks have carrying capacities, despite record-breaking visitation increasingly choking popular national parks in peak season. Based upon a PEER review of these 108 major units, only seven have established carrying capacities and all but one of those only cover only certain areas or facilities.

Rather than address this growing backlog of legally mandated planning, the proposed DO overlays another layer of planning considerations that can only detract from completing the planning Congress directed national parks to perform.

#### **V. Proposal Makes Nebulous Claim of Control of Resources Outside National Parks**

In a most curious provision, the Draft DO expresses the need to exercise NPS control over “resources outside parks...by increasing the use of existing authorities.” Yet, the DO draft does not identify what those authorities are or how they are to be executed.

The draft DO is littered with such cryptic and potentially controversial prescriptions. They indicate that this proposed DO is not well thought-out.

For the foregoing reasons PEER urges that this proposal be withdrawn.