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05/05/2003 09:16:18 AM

Record Type:Record

To: Lorraine D. Hunt OIRA BC RPT/OMB/EOP@EOP
cc: Lorraine D. Hunt OIRA ECON GUIDE/OMB/EOP@EOP
Subject: RE: Draft 2003 Report to Congress on the Costs and Benefits of Federal Regulations

[IMAGE]

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[IMAGE]

OMB Office of Information and Regulatory Affairs

Attn: Lorraine Hunt, NEOB Room 10202

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RE: Draft 2003 Report to Congress on the Costs and Benefits of Federal Regulations

This is a response to the Draft 2003 Report to Congress on the Costs and Benefits of Federal Regulations published in the Federal Register on Feb. 3, 2003. The National Park Visitors Alliance "NPVA" supports and encourages the concept of CCPV (conservation, consultation, preservation and visitation) for the National Park System "NPS". This four-point approach of conservation, combined with consultation will result in meaningful preservation and optimal visitation.

The NPVA is committed to the principal that our National Parks should benefit the greatest possible number of visitors while preserving the Parks' natural resources. Our motto echos the preamble over the first National Park, Yellowstone's main entrance, "National Parks are for the benefit and enjoyment of the American people."

We have read Draft 2003 Report to Congress on the Costs and Benefits of Federal Regulations and would like to make the following supporting comments:

The OMB-OIRA does an outstanding job of reviewing major regulations prior to implementation. OMB-ORIA guidelines are used by agencies in determining the cost of agency regulations and the benefits to society. Because of your success and sound market based scientific review of regulations

consider increasing the number of regulations reviewed. Many regulations on smaller more complex matters should be reviewed for costs and benefits. Agencies should include the BCA and the CEA methods when drafting regulations.

The Draft Guidelines in Appendix "C" represent a good revision to the prior guidelines. We suggest more emphasis on consultation during the policy review stage. Early consultation is key to finding partnerships and market based solutions. As the draft guidelines suggest consultation at the final draft rule stage is not the best approach when early opportunities to consult with stakeholders and organizations are available. Consider adding to the guidelines a list of the industries affected, their trade association contacts and stakeholders interested in the agencies actions together with economic profiles of the groups affected as part of your overall CEA approach. A computer based list server provides a no cost approach to early consultation and feedback during the process.

Externality issues should clearly identify common property congestion in relation to common user or visitor experiences. Enjoyment by average Americans while conserving the resource should be considered on a more important metric than renewable assets and common property resources. Public goods such as basic scientific research should require the same cost benefit analysis as the regulations that come from the studies. One must ask the question do we need more research on problems or should we focus on the problems we already know about and understand?

The Presidents Management Agenda suggests 5 areas for improvement. Additional consideration for "Competitive Sourcing" should include efforts to build capacity for non-profits to compete for contracting opportunities and market oriented approaches to regulations proposed by agencies. Lets provide a way to build partnership bridges with affected parties and make this part of the cost benefit analysis. Why should the regulations exclude potential partnerships?

Overall, OMB has set broad, achievable goals.

OMB has an enviable track record managing our agencies

reach into the lives of Americans. We are proud to have the opportunity

to contribute to the draft plan. We would like to be included in additional discussions

of the plan as it being developed.

Warm regards,

The National Park Visitors Alliance

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