



Comment on Office of Management and Budget (OMB) and 42 agencies' proposal to revise the Guidance for Federal Financial Assistance, May 29, 2026, 91 FR 32198

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I taught environmental law and policy and climate policy courses in the Ecology and Environmental Sciences Program for over 30 years. It was thrilling to observe my students becoming enthralled with the intelligence and effectiveness of American environmental law, as it had developed over the years since I was an undergraduate: a much-admired model for the rest of the world. The first advocacy exercise in the introductory course focused on the role of science in inspiring and framing the nature of environmental law. Science identified the problems created by changes in our environment, particularly those created by humans' pollution, consumption, and transformation of landscapes. It revealed how those problems impact the health and lives of humans and other species. It contributed essentially to the development of solutions. It tested the effectiveness of those solutions. As Rachel Carson stated in her acceptance speech for the National Book Award for Nonfiction in 1952, "The aim of science is to discover and illuminate the truth."

In this proposal the Trump administration advances one of many missiles in a general assault on the truth, and perhaps the most dangerous one. This proposal, for example, quite intentionally puts funding of U.S. climate science in the hands of a politician who has publicly declared an intention to "drive a sword into the heart of the climate change religion." It would make the time-honored practice of peer review, essential to ensuring the integrity of scientific research, an optional requirement for receiving federal funding. Suddenly the job of evaluating the quality and importance of science is determined not by scientists but by politicians. For 250 years our nation grew its strength and its extraordinary accomplishments from the contributions of diverse talents in science and other fields who came to America from around the world; these rules would prohibit funding for any project which acknowledged the values of diversity, equity and inclusion.

The proposed rule's quixotic effort to revise the nature of science runs afoul of numerous established environmental statutes. The pillars of America's leadership in environmental protection are its federal statutes—the National Environmental Policy Act, the Clean Air Act, the Clean Water Act, the Endangered Species Act, the Toxic Substances Control Act, etc. Those statutes, passed and amended with extraordinary bipartisan support, expressly operate on the foundation of science, and in particular scientific assessments of the environmental impacts of human activities. This proposed rule would fracture that foundation, and probably be rejected by the courts for that and other reasons.

As well, as summarized by *Forbes*, this proposal goes well beyond funding decisions for scientific research: "It's essential to understand that *every* federal grant will be subject to review by a political appointee rather than undergoing standard peer review by others with experience in the field. The goal is to ensure that the grants are not somehow "un-American" or contrary to Trump's desires. Every decision will undergo a political litmus test. Keep in mind that the [OMB proposal notes in § 200.340 that they can terminate existing awards](#) if they

are no longer aligned with 'Federal agency priorities, or that an agency otherwise determines is no longer in the Federal Government's interest.'"

This proposed rule requires grant applicants to demonstrate adherence to "Gold Standard Science" to receive federal funding, but it never explicitly defines the term. I suggest that this "gold" is fool's gold.

I urge the agencies collectively to revoke this proposal, and save time, energy, and countless taxpayer dollars in pursuing this. In the absence of drastic revision of its terms, this is a prime and probable target for resolutions of disapproval under the Congressional Review Act.