

3098



"James Gramann"
<jgramann@ag.tamu.edu>
02/07/2008 04:39 PM CST

To <Bruce_Peacock@nps.gov>, <John_Dennis@nps.gov>,
<Louise_Hose@nps.gov>, <Sandra_Hamilton@nps.gov>
cc <Megan_McBride@contractor.nps.gov>,
<d-breeding@tamu.edu>

bcc

Subject Instructions to CAHA peer reviewers

Hello All,

Attached is a draft set of instructions to the panel of peer reviewers for the Vogel song and Neal surveys conducted at Cape Hatteras National Seashore. If possible, please respond with comments by February 15.

I am planning on choosing five peer reviewers with expertise in one or more of the following areas: 1) survey sample design, 2) questionnaire design, 3) survey management, 4) statistical analysis, 5) economic impact analysis.

--

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At Texas A&M University:
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CAHA draft peer review instructions.doc

PEER REVIEW INSTRUCTIONS

Thank you for agreeing to serve on a peer review panel as part of the negotiated rulemaking process at Cape Hatteras National Seashore (CAHA). As the responsible official, I am managing the peer review and will compile your comments and forward them to the NPS project manager for the CAHA Off-Road Vehicle (ORV) Management Plan/Environmental Impact Statement. In turn, the project manager will transmit the results to the negotiated rulemaking committee that has been formed to assist in developing the park's ORV plan. This committee is composed of NPS staff and representatives of stakeholder groups.

You are being asked to provide written comments on two documents:

- Vogel song, H. (2003). Cape Hatteras National Seashore visitor use study;
- Neal, W. (2005). The Lower Outer Banks of North Carolina: Results of a survey of residents, nonresident property owners, and visitors.

The Vogel song report describes findings from a survey of visitors to CAHA conducted in 2001-2002. This survey was sponsored by the NPS. The Neal report describes findings from a survey of various groups conducted in 2002-2003. This survey was sponsored by the Outer Banks Preservation Association, a non-profit organization that advocates the protection and preservation of Outer Banks beaches within a framework of responsible, free, and open beach access for all users, including properly licensed drivers and vehicles.

You are also being furnished with comments pertinent to the CAHA negotiated rulemaking. These include:

- Neal, W. (2008). A critical review: Cape Hatteras National Seashore visitor use study;
- Comments and responses to the "Finding of No Significant Impact" for the Cape Hatteras National Seashore Interim Protected Species Management Strategy/Environmental Assessment;
- Comments by Holland & Knight LLP (on behalf of the Cape Hatteras Access Preservation Alliance) and by the American Sportfishing Association on the proposed rule to revise the designation of critical habitat for the wintering population of piping plover.

Context

The NPS plans to use the Vogel song and Neal studies, along with other research (e.g., studies from the Outer Banks Visitor's Bureau and the NPS Visitor Services Project survey conducted in 2000), to develop ranges of numbers for use in an economic impact analysis of alternatives for managing ORVs at CAHA. The alternatives could affect the number of ORVs on beaches at CAHA, with consequent changes in economic impacts from visitor spending. The NPS and the negotiated rulemaking committee are considering additional visitor use and economic data collection that could be obtained to add to the

available information. Therefore, the documents reviewed are not the only sources of data that will be used in arriving at a final decision.

The economic impact scenarios developed to date are based on counts of ORV use reported by Vogel song in his 2003 technical report. Some stakeholders have challenged the validity of these counts and the resultant economic-impact scenarios developed for the NPS by Industrial Economics, Inc.

Instructions to Reviewers

Peer reviewers will respond to 10 questions. However, reviewers are not limited to answering only these questions. They are free to include other comments that they feel are germane to the purpose of the review.

The overarching question guiding the review is:

- Do either the Vogel song or Neal surveys provide a sound scientific basis for estimating the total amount of ORV use at CAHA during the study period and the total visitor spending resulting from this activity? In other words, how suitable is the science of the studies for use in the planned role in decision-making?

To answer this question the following related points should be addressed:

- The ability to generalize the results of the data collections to the universe of CAHA visitors and other populations (i.e., residents and property owners);
- The design of the survey instruments and observation protocols;
- The rigor of the data-collection methods in the field;
- The appropriateness of the data analysis, including the characterization of uncertainty;
- The use of other data sources as cross-checks on key estimates of ORV use, including ferry counts and traffic counts;
- The potential for non-response bias;
- The reasonableness of conclusions based on survey data and other evidence.

In some cases, reviewers may find that insufficient information is provided in the two technical reports to answer a question. If this occurs, reviewers should specify the additional information that is needed to make a determination.

The original Vogel song and Neal data files are available in SPSS and Excel formats. It is not the purpose of this review to re-analyze these data, but please respond to the following two questions:

- Based on answers to the previous items, should the Vogel song or Neal data be re-analyzed? Why or why not?
- Should additional social science research be conducted to estimate the amount of ORV use at CAHA and the impact of this use on visitor spending? If so, what type of research is needed?

Review Process and Dates

The review will follow a seven step process:

- (Insert date)—Individual written assessments of the Vogelsong and Neal reports completed by peer reviewers, focusing on the 10 questions described above;
- (Insert date)—Initial review by the responsible official of the written assessments completed;
- (Insert date)—Conference call to allow peer reviewers to compare comments, share thoughts, and refine their individual evaluations;
- (Insert date)—Submission to responsible official of revised comments arising from the conference call;
- (Insert date)—Compilation of revised review comments by the responsible official;
- (Insert date)—Review of the compilation by peer reviewers;
- (Insert date)—Compilation and individual comments submitted to project manager.

Disclosure

These instructions have been reviewed and approved by the CAHA negotiated rulemaking committee and by appropriate NPS officials. This process follows guidelines in Section II(3) of the OMB Final Information Quality Bulletin for Peer Review and the requirements of the Privacy Act, 5 U.S.C. §522a as amended. Specifically, the NPS will appropriately maintain records documenting the peer review, including:

- The name and position of the responsible review management official;
- The name, affiliation, and pertinent qualifications of each reviewer;
- Determinations of disclosures regarding conflict of interest that could affect the independence of individual reviews;¹
- Objectives and structure of the review;
- Copies of reviewers' comments and the compilation of comments;
- Records of payment for reviewers' services.


The NPS will disclose the names, affiliations, and qualifications of reviewers to members of the negotiated rulemaking committee and to the authors of the two technical reports. Reviewers' comments will also be disclosed, but will not be specifically attributed. The compiled peer-review report by the responsible official will be disclosed to the negotiated rulemaking committee and to the authors.

The Department of the Interior does not have the statutory authority to protect confidentiality or to exempt reviewers' comments, identities, or credentials from a request under the Freedom of Information Act.

¹ Peer reviewers are considered independent if they: 1) have no direct involvement in the development of the material under review; 2) have no indirect involvement by significant consultation during development or by supervising the personnel who produced the material under review; or 3) have no significant personal relationship to persons directly involved in development of the material under review.

#3097

Louise Hose/WASO/NPS
02/12/2008 05:58 PM EST

To "James Gramann" <jgramann@ag.tamu.edu>
cc Bruce_Peacock@nps.gov, d-breeding@tamu.edu,
John_Dennis@nps.gov,
Megan_McBride@contractor.nps.gov,
bcc
Subject Re: Instructions to CAHA peer reviewers 



CAHA draft peer review instructions_rev-LH.doc

Jim,

I've looked over the instructions and have commented using Track Changes. My comments are based on the assumption that the goal is to determine the scientific validity and value of the two earlier papers/surveys towards informing current management decisions. I also assume you wish to create a process that is as resistant to challenges by folks who don't like the conclusions as possible. That said.....

I suggest providing less information that some (i.e., me) can interpret as leading or suggesting agendas in the writing. The initial stage and letter to the reviewers should focus on the science and its applicability to the current decision-making process. I'm guessing you don't want detractors claiming the reviewers favored the NPS-sponsored report because they were, errr, trying to gain favor with the Park Service. Nor do you want accusations that reviewers reviewed the Nash report unfavorably because of his sponsor's agenda. Or, for that matter, vice versa.

Also, when I've served on NSF and other panels (which this process appears to be), the reviewers made an independent review first and then came together to talk about the proposals and differing opinions. I think bringing in the issues raised by the attorneys and the FONSI responses, probably even Nash's comment on the NPS-sponsored report, should come during the conference call and not before the reviewers made their own read.

I hope these thoughts help.

Louise Hose
Natural Resource Stewardship and Science - National Park Service
Louise_Hose@nps.gov
202-513-7177

PEER REVIEW INSTRUCTIONS

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You are being asked to provide written comments on two documents:

- Vogelsong, H. (2003). Cape Hatteras National Seashore visitor use study;
- Neal, W. (2005). The Lower Outer Banks of North Carolina: Results of a survey of residents, nonresident property owners, and visitors.

The Vogelsong report describes findings from a survey of visitors to CAHA conducted in 2001-2002. This survey was sponsored by the NPS. The Neal report describes findings from a survey of various groups conducted in 2002-2003. This survey was sponsored by the Outer Banks Preservation Association, a non-profit organization that advocates the protection and preservation of Outer Banks beaches within a framework of responsible, free, and open beach access for all users, including properly licensed drivers and vehicles.

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Comment [MSOffice1]: I would suggest also deleting the yellow areas. I think you will get more objective comments if the study sponsors are not identified.

You are also being furnished with comments pertinent to the CAHA negotiated rulemaking. These include:

- Neal, W. (2008). A critical review: Cape Hatteras National Seashore visitor use study;
- Comments and responses to the "Finding of No Significant Impact" for the Cape Hatteras National Seashore Interim Protected Species Management Strategy/Environmental Assessment;
- Comments by Holland & Knight LLP (on behalf of the Cape Hatteras Access Preservation Alliance) and by the American Sportfishing Association on the proposed rule to revise the designation of critical habitat for the wintering population of piping plover.

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Comment [MSOffice2]: You might leave in the Neal comments as additional material to evaluate. But, I wouldn't put the more agenda-driven material in the packet.

Context

The NPS plans to consider use of the Vogelsong and Neal studies, along with other research (e.g., studies from the Outer Banks Visitor's Bureau and the NPS Visitor Services Project survey conducted in 2000), to develop ranges of numbers for use in an economic impact analysis of alternatives for managing ORVs at CAHA. The alternatives could affect the number of ORVs on beaches at CAHA, with consequent changes in economic impacts from visitor spending. The NPS and the negotiated rulemaking committee are considering additional visitor use and economic data collection that could

be obtained to add to the available information. Therefore, the documents reviewed are not the only sources of data that will be used in arriving at a final decision.

Comment [MSOffice3]: I think I know what you mean, but the statement could be clearer.

The economic impact scenarios developed to date are based on counts of ORV use reported by Vogelsong in his 2003 technical report. Some stakeholders have challenged the validity of these counts and the resultant economic-impact scenarios developed for the NPS by Industrial Economics, Inc.

Comment [MSOffice4]: The last sentence says "are considering". This statement seems much more definite. I think the last two sentences can be better written.

Instructions to Reviewers

Peer reviewers will respond to 10 questions. However, reviewers are not limited to answering only these questions. They are free to include other comments that they feel are germane to the purpose of the review.

Comment [MSOffice5]: I really like this entire section and see it as the meat of the issue.

The overarching question guiding the review is:

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To answer this question the following related points should be addressed:

- The ability to generalize the results of the data collections to the universe of CAHA visitors and other populations (i.e., residents and property owners);
- The design of the survey instruments and observation protocols;
- The rigor of the data-collection methods in the field;
- The appropriateness of the data analysis, including the characterization of uncertainty;
- The use of other data sources as cross-checks on key estimates of ORV use, including ferry counts and traffic counts;
- The potential for non-response bias;
- The reasonableness of conclusions based on survey data and other evidence.

In some cases, reviewers may find that insufficient information is provided in the two technical reports to answer a question. If this occurs, reviewers should specify the additional information that is needed to make a determination.

The original Vogelsong and Neal data files are available in SPSS and Excel formats. It is not the purpose of this review to re-analyze these data, but please respond to the following two questions:

- Based on answers to the previous items, should the Vogelsong or Neal data be re-analyzed? Why or why not?
- Should additional social science research be conducted to estimate the amount of ORV use at CAHA and the impact of this use on visitor spending? If so, what type of research is needed?

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The review will follow a seven step process:

- (Insert date)—Individual written assessments of the Vogelsong and Neal reports completed by peer reviewers, focusing on the 10 questions described above;
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Comment [MSOffice6]: This would be the time to question the reviewers about points raised in the FONSI and by the lawyers.

Disclosure

These instructions have been reviewed and approved by the CAHA negotiated rulemaking committee and by appropriate NPS officials. This process follows guidelines in Section II(3) of the OMB Final Information Quality Bulletin for Peer Review and the requirements of the Privacy Act, 5 U.S.C. §522a as amended. Specifically, the NPS will appropriately maintain records documenting the peer review, including:

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3096



Bruce
Peacock/FTCOLLINS/NPS
02/14/2008 11:22 AM MST

To James Gramann/Partner/NPS@NPS
cc Sandra Hamilton/DENVER/NPS@NPS
bcc
Subject CAHA peer review instructions

Hi Jim:

I had very few comments on the draft instructions - here they are.

Thanks...Bruce



CAHA draft peer review instructions - BEP comments.doc

PEER REVIEW INSTRUCTIONS

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Context

The NPS plans to **use-consider** the Vogelsong and Neal studies, along with other research (e.g., studies from the Outer Banks Visitor's Bureau and the NPS Visitor Services Project survey conducted in 2000), to develop ranges of numbers for use in an economic impact analysis of alternatives for managing ORVs at CAHA. The alternatives could affect the number of ORVs on beaches at CAHA, with consequent changes in economic impacts from visitor spending. The NPS and the negotiated rulemaking committee are considering additional visitor use and economic data collection that could be obtained to add to the

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The economic impact scenarios developed to date are based on counts of ORV use reported by Vogel song in his 2003 technical report. Some stakeholders have challenged the validity of these counts and the resultant economic-impact scenarios developed for the NPS by Industrial Economics, Inc.

Comment [N1]: It might be relevant to mention that none of the management alternatives currently under consideration by NPS includes a total ban of ORV at the park.

Instructions to Reviewers

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- The use of other data sources as cross-checks on key estimates of ORV use, including ferry counts and traffic counts;
- The potential for non-response bias;
- The reasonableness of conclusions based on survey data and other evidence.

In some cases, reviewers may find that insufficient information is provided in the two technical reports to answer a question. If this occurs, reviewers should specify the additional information that is needed to make a determination.

The original Vogel song and Neal data files are available in SPSS and Excel formats. It is not the purpose of this review to re-analyze these data, but please respond to the following two questions:

- Based on answers to the previous items, should the Vogel song or Neal data be re-analyzed? Why or why not?
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3095

John Dennis/WASO/NPS
02/14/2008 01:52 PM EST

To "James Gramann" <jgramann@ag.tamu.edu>
cc Bruce_Peacock@nps.gov, d-breeding@tamu.edu,
Louise_Hose@nps.gov,
Megan_McBride@contractor.nps.gov,
bcc
Subject Re: Instructions to CAHA peer reviewers 

Hi -

In reviewing the instructions, I came away with the realization that there may be two different reviews being discussed. One is the review of two specific articles. The other is a review of a broader body of information. I have inserted suggested edits and several comments into the text that would push the review into the direction of reviewing only the two specific articles. If the actual intent is to review more documents, then my comments are less germane and I suggest having a revised set of instructions focused on a broader array of documents be circulated for review.

I also suggest having the peer review plan specifically mention that NPS considers this review to be a review of informative, rather than influential, scientific information.

Thanks.

JGD



CAHAdPrRvInstrJGD.doc

John G. Dennis
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National Park Service
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john_dennis@nps.gov

John Dennis Comments
February 14, 2008

PEER REVIEW PLAN AND INSTRUCTIONS

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- Comments by Holland & Knight LLP (on behalf of the Cape Hatteras Access Preservation Alliance) and by the American Sportfishing Association on the proposed rule to revise the designation of critical habitat for the wintering population of piping plover.

Context

The NPS plans to **use-consider** the Vogelsong and Neal studies, along with other research reports (e.g., studies from the Outer Banks Visitor's Bureau and ~~the-an~~ NPS Visitor Services Project survey conducted in 2000), ~~to-in~~ developing ranges of numbers for use in an economic impact analysis of alternatives for managing ORVs at CAHA. The alternatives could affect the **permitted** number of ORVs on beaches at CAHA, with consequent changes in economic impacts from visitor spending. The NPS and the negotiated rulemaking committee **also** are considering **sponsoring** additional visitor use

Comment [d1]: I suggest deleting this part of the sentence. I think it is too much detail here. The key points are the titles of the documents and the sources of the documents. If a peer reviewer asks about this association, the peer reviewer can be directed to the association's website and/or told more detail in response to the question. If one peer reviewer were to ask, then it would be better for the answer to be directed to all the peer reviewers, and the best answer in neutral terms would be to provide the web address.

Comment [d2]: I suggest these identified documents not be presented to the peer reviewers. The earlier statement says the peer reviewers are asked to review only two documents. If the purpose of the review is to review only the two science documents, these additional documents are not germane. If the purpose of the review is to review a broader body of literature that includes these additional documents, then the scope of the review needs to be broadened. On their faces, only one of these three documents appears to be germane to the question of peer review of the two science documents. Overall, I believe we will obtain a more independent review of the two science documents if the reviewers are not given these three documents, either at all, or at least not until after the reviewers have submitted their first set of comments.

and economic data collection that could be obtained to add to the available information. Therefore, the two documents that you will reviewed are likely will not be the only sources of data that will be used in arriving at a final decision.

The economic impact scenarios developed by NPS to date are based on counts of ORV use reported by Vogelsong in his 2003 technical report. Some stakeholders have challenged the validity of these counts and the resultant economic-impact scenarios developed for the NPS by Industrial Economics, Inc.

Comment [d3]: I think this background information is not appropriate because it may jeopardize the independence of the peer reviewers as they conduct their independent assessments of the two science reports. I suggest deleting this paragraph entirely, or at least not presenting it to the reviewers until after they have submitted their preliminary comments.

Instructions to Reviewers

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The overarching question guiding the review is:

- Does either the Vogelsong or Neal surveys provide a sound scientifically valid basis for estimating either or both the total amount of ORV use at CAHA during the study period and the total visitor spending resulting from this activity? In other words, how suitable is the science of these two studies for use in informing the planned role in decision-making?

To answer this question the following related points should be addressed:

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- The rigor of the data-collection methods in the field and the procedures for ensuring that rigor;
- The appropriateness of the data analysis, including the characterization of uncertainty;
- The appropriateness and comprehensiveness of use of other data sources as cross-checks on key estimates of ORV use, including ferry counts and traffic counts;
- The potential for non-response bias;
- The reasonableness of conclusions based on the survey data and other evidence presented in the reports.

In some cases, reviewers may find that insufficient information is provided in the two technical reports to answer a question. If this occurs, reviewers should specify the additional information that is needed to make a determination.

The original Vogelsong and Neal data files are available in SPSS and Excel formats. It is not the purpose of this review to re-analyze these data, but please respond to the following two questions:

- Based on answers to the previous items, ~~should~~ would there be value in reanalyzing the Vogel song or Neal ~~data be re-analyzed data~~? Why or why not? If yes, what key points should be examined as part of the reanalysis?
- ~~Should~~ Would conducting additional social science research ~~be conducted~~ improve the ability to estimate the amount of ORV use at CAHA and the impact of this use on visitor spending? If so, what type or types of research ~~is~~ would be needed?

Review Process and Dates

The review will follow a seven step process:

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- (Insert date)—Review of the responsible official's compilation by peer reviewers;
- (Insert date)—~~Compilation~~ Final compilation and individual, refined comments submitted to project manager.

Comment [d4]: Include here a statement of the purpose of this initial review – is it in fact a consolidation of the individual review comments into a draft synthesis for presentation to review panel members?

Disclosure

These instructions have been reviewed and approved by the CAHA negotiated rulemaking committee and by appropriate NPS officials. ~~This~~ Although this peer review has been determined to be a review of informative scientific information, not of influential scientific information, this process follows guidelines in Section II(3) of the OMB Final Information Quality Bulletin for Peer Review; the NPS Interim Guidance Document Governing Code of Conduct, Peer Review, and Information Quality Correction for National Park Service Cultural and Natural Resource Disciplines (January 31, 2008); and the requirements of the Privacy Act, 5 U.S.C. §522a as amended. Specifically, the NPS will appropriately maintain records documenting the peer review, including:

- The name and position of the responsible peer review ~~management manager~~ official;
- The name, affiliation, and pertinent qualifications of each peer reviewer;
- Determinations of whether or not peer reviewer disclosures regarding potential conflicts of interest ~~that identify any conflicts that~~ could affect the independence of individual reviews;¹

¹ Peer reviewers are considered independent if they: 1) have no direct involvement in the development of the material under review; 2) have no indirect involvement by significant consultation during development

- Objectives and structure of the review;
- Copies of reviewers' comments and the compilation of comments;
- Records of payment for reviewers' services.

The NPS will disclose the names, affiliations, and qualifications of reviewers to members of the negotiated rulemaking committee and to the authors of the two technical reports. Reviewers' comments will also be disclosed, but will not be specifically attributed. The compiled peer-review report by the responsible official will be disclosed to the negotiated rulemaking committee and to the authors **and may be made publicly available.**

The Department of the Interior does not have the statutory authority to protect confidentiality or to exempt reviewers' comments, identities, or credentials from a request under the Freedom of Information Act.

or by supervising the personnel who produced the material under review; or 3) have no significant personal relationship to persons directly involved in development of the material under review.