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March 31, 2008

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Carol Mansfield, Ph.D.
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Dear Ms. Hamilton and Dr. Mansfield:

At the request of the American Sportfishing Association, I was asked to review the Vogel song paper and Mr. Neal's response dated January 9th, 2008. I conducted my review based on my 20 years of experience conducting sportfishing economic research on behalf of state fish and wildlife agencies, the sportfishing industry, and conservation organizations. My major concerns include:

1. There is an apparent lack of randomness in the data collection process in the Vogel song study. A warning sign is found on page 13 in the first full paragraph. This paragraph states the sites were selected to represent a range of activities. This indicates sample site selection was not randomized, and no basis for selection is offered. Towards the end of this paragraph the author states the visitor sample "is felt to be fairly representative." Needless to say, using personal feelings to ensure a sample size is representative does not provide the base for a scientific study. In the paragraph that carries over to page 9, the author states "it is hoped that these counts are representative" of other park areas, indicating that estimates for one area were extrapolated to other areas without any idea if appropriate or not. "Hope" is not a reliable basis for a scientific analysis that will be used to make management decisions impacting families and businesses.

In any future CAHA participation research, even if pure random sampling is initiated, funds must permit for a large enough number of sites to be sure all activities and methods of accessing CAHA are reliably represented in the final data sets. Based on the author's comments, we cannot be sure what the data actually report.

2. Overall, I don't get the sense the report was designed to address ORV use as it relates to the proposed closed areas. Recognizing the limited sampling, in terms of sample size and seasonal variations, it is possible that the report has been used beyond its statistical limitations.
3. The executive summary in Mr. Neal's review of the Vogelsong study I felt summarized many of the shortcomings rather well. One claim made by Mr. Neal especially caught my attention. He states that the Vogelsong report's findings cannot be replicated. For research to be considered scientifically valid, it has to be replicable. Mr. Neal states his analysis of the Vogelsong data provides different results that do not support the claims made in the Vogelsong paper. If the data were incorrectly analyzed, all assumptions and "facts" based on the Vogelsong report should be tossed and analytical efforts start anew, depending on the severity of any analytical errors. The claims made by Mr. Neal certainly justify an independent re-analysis of the Vogelsong data. I understand Mr. Neal has conducted his own analysis, too. His analysis would also merit a similar independent review as well.
4. If additional research is conducted, I suggest that surf/ORV anglers are separated from marina & pier anglers. The equipment used by these two types of anglers vary significantly as do the seasons they fish, species sought, and locations fished. There may be significant differences in economics, usage patterns and preferences between these angler groups that may affect ORV-related management decisions.

With all due respects,



Rob Southwick,
President

cc: Mike Murry, Superintendent, Cape Hatteras National Seashore
Members of the Cape Hatteras National Seashore Negotiated Rulemaking
Committee
Patricia Doerr, American Sportfishing Association