

From: [Sherri Fields](#)
To: [Sonya A Jones](#)
Bcc: [Mike Murray](#)
Subject: Protocols for Cape Hatteras National Seashore
Date: 06/24/2009 04:37 PM
Attachments: [OverviewFinal2.doc](#)

Sonya -

Thanks for taking the time to listen to my questions and I appreciate any assistance you can provide on this matter. Please find attached the Synthesis document for the four protocols that were produced by USGS for Cape Hatteras. As I mentioned, the Superintendent at Cape Hatteras is in the midst of developing alternatives for their ORV management plan and is basing resource protection aspects on the protocols. I've included below some additional context for this issue as conveyed to me by the Supt.

Based on public deliberations during the negotiated rulemaking process, the credibility of the protocols has been raised repeatedly, particularly given that they do not appear to be official agency documents. Concerns about the credibility of the protocols have been frequently expressed by ORV stakeholders and public commenters throughout the RegNeg process and the protocols continue to be mentioned as a focal point of attack by ORV stakeholders in electronic media (e.g., commentary and blogs on the Island Free Press; Dr. Mike Berry, etc.). We had a similar issue early in the RegNeg process and the NPS arranged for a peer review of another study (on economic impacts) the park had been relying on, due to so many stakeholder concerns about it. As it turned out, that peer review revealed significant concerns about relying upon that study as a basis for estimating the potential economic impacts regarding ORV use. In other words, an objective peer review more or less shot down some of the conclusions of that study.

The informal format of the USGS protocols (e.g., no report # and no formal sign-off by a USGS official) gives them a less-than-official appearance. There have also been questions raised about the extent/robustness of the peer review for the documents. Although we think the content of the USGS protocols is generally biologically credible, given the sole focus of resource protection without regard to other park management objective, the park is finding it difficult to defend them as "good science" from constant attacks. In any case, anticipating that the USGS protocols, as they currently exist, will be a major point of attack as the planning process moves forward, the park would like to be proactive and have an objective review conducted of the USGS protocols (better to do it now before we fully commit to relying on them in the DEIS, rather than find out the flaws later) to confirm their scientific credibility. Even though these protocols were written prior to your current Peer Review policy becoming effective, the public is aware of this policy and would likely be expecting something toward that standard to be credible.

I will wait to hear from you relative to the track that USGS will want to take. Thanks again for your help.

Sherri



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502.3 - Fundamental Science Practices: Peer Review

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