



United States Department of the Interior

U.S. GEOLOGICAL SURVEY
Reston, Virginia 20192

September 16, 2015

Noreen Walsh
Regional Director, Mountain-Prairie Region
U.S. Fish and Wildlife Service
134 Union Blvd.
Lakewood, CO 80228

Dear Noreen,

On July 24, 2015, a Department of the Interior (DOI) letter was sent on behalf of three of its bureaus, including the U.S Geological Survey (USGS), in response to an Information Quality Act (IQA) Request for Correction dated March 18, 2015, submitted by Holsinger Law, LLC on behalf of various Petitioners (http://www.usgs.gov/info_qual/documents/initial_IQA_inquiry_and_ExhibitsA-B-C_031815.pdf). The request regarded a publication identified as *Comprehensive Review of Ecology and Conservation of the Greater Sage Grouse: A Landscape Species and its Habitats*, which USGS interpreted to actually mean a monograph with a similar title (*Ecology and Conservation of the Greater Sage Grouse: A Landscape Species and its Habitats*) published in *Studies in Avian Biology* (a publication of the Cooper Ornithological Society printed by the University of California Press).

The DOI letter (available at http://www.usgs.gov/info_qual/documents/Final_USGS_Response_signed072415.pdf) indicated the USGS's intent to make available to the U.S. Fish and Wildlife Service (USFWS) a more detailed response to the Petitioners' request for inclusion in the USFWS Decision File for the 2015 determination on whether the Greater Sage-Grouse remains warranted for listing. The enclosed document constitutes that more detailed response record for inclusion in the USFWS Decision File.

Please contact me (by email: akinsinger@usgs.gov) or Carol Schuler (by email: cschuler@usgs.gov or telephone: 541-750-1031) if you have any questions about the enclosed.

Sincerely,

Anne E. Kinsinger
USGS Associate Director for Ecosystems

Enclosure

Cc: Gary Frazer
Melanie Steinkamp
Nicole Alt

September 16, 2015

U.S. Geological Survey Response Record to the Request for Correction of Information under the Data Quality Act and Applicable Information Quality Guidelines, Dated March 18, 2015

In response to the March 18, 2015 Data Quality Act (DQA) Request for Correction (Request) of the U.S. Geological Survey (USGS) *Comprehensive Review of Ecology and Conservation of the Greater Sage Grouse: A Landscape Species and its Habitats* (incorrectly titled) submitted by Holsinger Law, LLC on behalf of various Petitioners, the USGS has prepared this record to address the allegations in the Request. This record is organized by the individual sections provided in the Petitioners' Request (http://www.usgs.gov/info_qual/documents/initial_IQA_inquiry_and_ExhibitsA-B-C_031815.pdf). Many of the individual allegations are repetitive and are most thoroughly addressed in the sections where they first appear. As stated in the July 24, 2015 letter to Ms. Kathleen Sgamma (http://www.usgs.gov/info_qual/documents/Final_USGS_Response_signed072415.pdf), this follow up response record to the Request is being provided to the U.S. Fish and Wildlife Service (USFWS) for inclusion in the Decision File for the 2015 determination on whether the Greater Sage-Grouse remains warranted for listing. The following sections respond to the "titled" sections outlined in the Petitioners' Request.

I. "Introduction"

The title of the monograph, published in 2011 in *Studies in Avian Biology*, is "Greater Sage-Grouse: Ecology and Conservation of a Landscape Species and Its Habitats." This clarification is made because the Petitioners misidentified the monograph in the Request; instead, presenting the title of their Exhibit B, which was a critique of the monograph. The monograph is a publication in a scientific book series, *Studies in Avian Biology* of the Cooper Ornithological Society. It was printed and distributed by the University of California Press, and is not a USGS publication. Employees of the USGS and Idaho Fish and Game co-edited the Monograph, and the Cooper Ornithological Society assigned the Editor-in-Chief.

II. "The Petitioners"

No response requested.

III. "The Monograph Violates the Quality, Objectivity, Utility and Integrity Standards of the DQA and its Guidelines"

The science in the monograph is sound, and meets standards identified in the DQA (also known as the Information Quality Act) for quality, objectivity, utility, and integrity. Objectivity was ensured throughout the process of creating each chapter, from the co-editors invitation of subject matter experts through rigorous peer review of manuscripts by co-editor-selected experts to the final decision on acceptance of the manuscript for publication by an outside Editor-in-Chief of the scientific book series. Utility was reflected in the usefulness of the information to managers, researchers, and the general public. Selection of a scientific book series (*Studies in Avian Biology*) was deemed an appropriate publication outlet for making the information accessible to the scientific and management community. Usefulness of the information to the USGS itself was not a consideration because the USGS does not manage natural or cultural resources.

The peer review of monograph chapters ensured that the quality of the final published material met the standards of the scientific and technical community. Expertise of reviewers was an important consideration in their selection, and at least two reviews were solicited for each chapter with the intent of spanning a variety of scientific disciplines, areas of technical expertise, and scientific perspectives. The charge to the reviewers was to provide advice on the reasonableness of inferences drawn from the scientific evidence. As explained below, in relevant part, the peer-review standards of the DQA overlap those of *Studies in Avian Biology* and the Cooper Ornithological Society.

Process integrity was maintained by avoidance of real or perceived conflicts of interest and adherence to defined procedures of the scientific book series in which the monograph was published. The review of the chapters authored by USGS scientists also adhered to defined policies and procedures of the USGS. The review procedures did not include a process for public comment and involvement or public disclosure of the names and affiliations of peer reviewers and the reviews. This was appropriate because the monograph was not considered to be “influential scientific information” (influential) or a “highly influential” scientific assessment, (highly-influential) in 2007 when its development was initiated in a proposal to the series editor of *Studies in Avian Biology*, nor were there plans to release the information as a Federal Government publication. At that time authors were recruited to write chapters, and co-editors of the volume defined the process for producing the monograph, including the peer-review process. Only later, in December 2007, did the court order that the USFWS should reconsider its decision not to list the Greater Sage-Grouse under the Endangered Species Act.

III. “A. The Monograph is Not Transparent”

The USGS information in the monograph meets the DQA Guidelines of the Office of Management and Budget (OMB) and the USGS for “transparency.” Specifically, with regard to transparency as it relates to data collection and analyses, those chapters with new analyses identified data sources and described in detail the analytical methods applied to facilitate reproducibility of the information by other qualified scientists. For example, non-proprietary and non-sensitive data were made available on the USGS website. The States regarded the lek data as proprietary. Similarly, the use of spatial data for pipelines and Department of Defense lands was conditional. The USGS website presented (and still presents) spatial and tabular data for chapters 1, 5, 10, 11, 12, 13, 15, 16, 17, and the Introduction. Refer to (<http://sagemap.wr.usgs.gov/monograph.aspx#CAdata>) or (<http://sdfs.wr.usgs.gov/ArcGIS/rest/services/StudiesInAvianBiology/StudiesInAvianBiologyData/MapServer>).

The OMB and USGS guidelines address transparency as it relates to peer review only in the context of influential or highly influential. The USGS did not designate the monograph as influential or highly influential; therefore, the USGS information in the monograph was not subject to the OMB’s Final Information Quality Bulletin for Peer Review (Peer Review Bulletin) requirements. Nevertheless, the robustness of the peer-review process for the monograph was disclosed in general terms in the preface: “In all, 63 reviewers represented 39 organizations, including 8 state agencies, 8 federal agencies, 18 universities, and 5 nongovernmental organizations. Only 11 individuals both authored and reviewed chapters.” [p. xi]. No author reviewed or managed the review of his or her chapter(s).

The monograph was not designated by the USGS as influential or highly influential because a) the USGS considered only the chapters authored by USGS authors as USGS information; b) the ultimate outlet for all chapters was a scientific book series rather than a USGS publication; and c) the USGS

could not reasonably determine that any given chapter would have a clear and substantial effect on important public policy decisions.

Specifically, the monograph includes the research findings of, respectively, the USGS and other Federal agency, university, state agency, and non-governmental scientists. Twelve chapters have USGS authors; 12 other chapters do not. Further, the outlet for the information in the monograph was a scientific book series (*Studies in Avian Biology*) of a professional society dedicated to the dissemination of ornithological knowledge. There was no original intent for the USGS to be the official outlet for the information. Further, the USFWS did not convene the team of authors for the purpose of obtaining information or viewpoints on the 2010 listing decision, and the monograph does not provide management recommendations to the USFWS, Bureau of Land Management, U.S. Forest Service, or other Federal agencies; therefore, the Federal Advisory Committee Act does not apply.

Although the USGS-authored chapters (and the other chapters in the monograph) were scientific contributions to an important natural resources issue, they were not envisioned to be the sole sources of information used in any future management or regulatory action. The decision to publish the monograph, invitations to chapter authors to contribute, and the decision about how the peer review would proceed occurred prior to a December 2007 court order to the USFWS. The court order pointed to the monograph as an important information source for a future decision, but the USGS could not at that time predict how or to what extent any management agency would use the information in any given chapter. A 2010 USFWS finding that the Greater Sage-Grouse was warranted for listing under the Endangered Species Act but precluded by higher priority listing actions had 500 references listed, of which 22 were chapters of the monograph. Some chapters of the monograph were cited extensively within the finding; others were not.

III. “B. The Monograph is Not Reproducible”

The USGS information in the monograph meets the DQA Guidelines of OMB and USGS for “reproducibility.” The OMB Guidelines define “reproducibility” as “the information is capable of being substantially reproduced, subject to an acceptable degree of imprecision.” [OMB Fed. Reg. 2002, 67 (36): 8460], which is met by the monograph with the detailed descriptions of source data and analytical methods for those chapters that contained new analyses, and in the detailed citation of sources in all chapters. All chapters in the monograph provided detailed descriptions of methods of research, including procedures for data collection and analysis.

III. “C. USGS Policy Unlawfully Contradicts the DQA, the Guidelines, OMB's Peer Review Bulletin and FOIA”

USGS policies have been developed and reviewed through a rigorous process, and they are periodically reviewed and revised. USGS Survey Manual chapter 502.3 (Fundamental Science Practices: Peer Review, <http://www.usgs.gov/usgs-manual/500/502-3.html>) explains the applicable requirements for the disclosure of pre-publication data and information, as well as appropriate disclaimer statements. Unpublished data and information are not publicly released as such. This information may be released under the Freedom of Information Act (FOIA) or released in accordance with USGS practices. The release determination includes consideration of the DQA, the Guidelines, and OMB's Peer Review Bulletin requirements. When the USGS determines that releasing the information is appropriate, outside of the FOIA process, the USGS follows its Fundamental Science Practices to validate and ensure the

quality of the data or information before publication. USGS routinely proactively releases information in various formats on USGS and other Federal Government websites.

While processing FOIA requests, the USGS follows the law and the Department of the Interior (DOI) FOIA regulations to make a release determination. Third-party peer reviewers may act as “consultant corollary” and their comments may fall under FOIA Exemption 5 and be withheld as pre-decisional information under the deliberative process privilege (Department of Justice, Guide to the Freedom of Information Act, Chapter 5, <http://www.justice.gov/oip/foia-guide13/exemption5.pdf>).

III. “D. Conflicts of Interest with the Monograph and Other Key Documents”

The co-editors established and followed a rigorous process to avoid conflicts of interest and openly described aspects of that process. From the preface of the monograph: "This volume reflects a broad spectrum of expertise in sagebrush and Greater Sage-Grouse ecology. Thirty-eight authors represented 20 organizations, including 6 state agencies, 3 federal agencies, 6 universities, and 5 nongovernmental organizations. In all, 63 reviewers represented 39 organizations, including 8 state agencies, 8 federal agencies, 18 universities, and 5 nongovernmental organizations. Only 11 individuals both authored and reviewed chapters." [p. xi]. No author reviewed or managed the review of his or her chapter(s).

This assessment is supported by an independent review of the book published in *Ibis* (a publication of the British Ornithologists' Union) that found “It (the book) is evidence that a large number of specialists have independently and patiently investigated many aspects of Sage Grouse ecology over a huge area for many years.” [Ibis 2012, 154(1): 222-223]

III. “E. The Monograph Did Not Undergo Adequate nor Open Peer Review”

Each chapter of the monograph received rigorous, independent peer review consistent with the standards of the scientific book series *Studies in Avian Biology*. This peer-review process safeguarded against conflicts of interest. Further, USGS-authored chapters were reviewed by the USGS in compliance with the Bureau’s Fundamental Science Practices requirements (<http://www.usgs.gov/fsp/policies.asp>). Peer reviewers included both an expert in Sage-Grouse or sagebrush ecology and an outside expert in the ecological topic. At least one and often both associate editors reviewed each chapter. There were a total of 63 reviewers; only 11 served as both chapter authors and reviewers (and never of their own chapters). Final acceptance for publication of individual chapters and the complete monograph rested with the *Studies in Avian Biology* Editor-in-Chief. Refer to the specific explanations below III.E.1-6.

III.E. “1. Peer Review Standards”

The peer review of information in the monograph (including the information in USGS-authored chapters) meets the OMB and USGS Guidelines, as each chapter was subjected to formal, independent, and external peer review. Regardless, non USGS-authored chapters are not subject to the OMB Bulletin for Peer Review as they do not represent the official view of an agency of the Federal government. The information in the monograph was not designated influential or highly influential at the time of peer review; therefore, it was not subject to the additional Peer Review Bulletin requirements for public disclosure of the peer review planning and summary documentation. Nevertheless, as stated above, the preface in the monograph (p. xi) provides a description of the process to demonstrate the peer review’s rigor and independence. Furthermore, many of the peer reviewers were identified in chapter acknowledgments. The petitioners have the option to contact the Cooper Ornithological Society to ask for the reviews, but consistent with any journal, the reviews are usually viewed as proprietary.

III.E. “2. USGS Did Not Meet its Review and Approval Process”

The USGS met applicable review and approval requirements. USGS-authored chapters were reviewed by the USGS in compliance with the Bureau’s Fundamental Science Practices requirements. All chapters received a minimum of two peer reviews by qualified reviewers. These reviews were managed by an associate editor of the monograph except in the cases where the USGS associate editor was a chapter author. In those instances, the associate editor’s USGS supervisor managed the review. All USGS-authored chapters then received Bureau approval for publication by a designated USGS Bureau Approving Official assigned to the USGS Office of Science Quality and Integrity. That approving official reviewed the original comments from the peer reviewers, reconciliation indicating how review comments were addressed, and the final manuscript after reconciliation of review feedback. In those instances when the non-USGS associate editor was an author, reviews of those chapters were managed by the USGS associate editor. In addition, each chapter was reviewed by the *Studies in Avian Biology* Editor-in-Chief, who made the final determination if the paper met all requirements to be included in the monograph. The University of California Press also required a publication recommendation from the Editorial Committee of the Cooper Ornithological Society.

III.E. “3. Conflicts of Interest in the Monograph and its Peer Review”

The process of producing the monograph stringently avoided conflicts of interest. As described above, the safeguards included the selection of a wide variety of authors (n=38) and even wider selection of reviewers (n=63). Additional safeguards were provided with multiple layers of process approval, with the final decision to publish resting with the Editor-in-Chief of *Studies in Avian Biology*, who was an adjunct professor at Boise State University. In regard to the peer review, the USGS chapters, and in reality all the chapters, complied with USGS Survey Manual chapter 502.3.4.B, which reads “USGS defines peer review (also referred to as technical peer review, refereeing, or scientific peer review) as scrutiny of work or ideas by colleagues (peers) who are well qualified and who are of equal standing with another. In the scientific field the implication is that education and/or experience qualify one to comment on the work of others in a particular field of expertise. Qualified peer reviewers of USGS information products must have no stake in the outcome of the review or publication of the work, are not associated with the work being performed, **and are without conflict of interest.**” [emphasis added]

III.E. “4. Peer Review Failed to Undergo Public Review and Comment”

There is no requirement for all Federal Government publications or peer review of those publications to undergo public review and comment. Because the USGS-authored chapters and the monograph as a whole were not designated “highly influential,” USGS did not need to determine whether public participation in peer review was feasible or appropriate.

III. “E.5. Persuasive Showing Overcomes the Presumption of Objectivity”

The USGS-authored chapters and the monograph as a whole meet the OMB requirement for objectivity having “been subjected to formal, independent, and external peer review” as part of the process of being published in *Studies in Avian Biology*.

Furthermore, the Petitioners' submitted information, including Exhibits A, B, and C, is not a persuasive showing for overcoming the presumption of objectivity. Exhibit A is a report prepared by staff of the Center for Environmental Science, Accuracy and Reliability (CESAR). It does not meet the standards and expectation of peer-reviewed science. In addition, names of authors are not provided for this report,

although the “senior science advisor” [<http://www.bestscience.org/about-us.html> accessed 8/12/15] of the organization affiliated with Exhibit A is the lead author of Exhibits B and C. Exhibit B is a consultant report, without evidence of peer review. It does not disclose potential financial or other conflicts of interest. Exhibit C is a manuscript described as “open-source peer-reviewed.” No supporting evidence of the legitimacy of the ‘peer review’ for Exhibit C is provided, and the “open-source” used is not a top-tier journal or an “open-source journal.” A web search using Google Scholar on September 14, 2015 identified the source of Exhibit C as the Western Energy Alliance website, and further indicated that the manuscript had not been cited in peer-review scientific literature. In sum, these exhibits are best characterized as opinion rather than objective scientific information.

III.E. “6. The Monograph Failed to Address Reviewer Criticisms”

As stated above, the USGS-authored chapters and the remaining chapters went through a rigorous peer review consistent with USGS policy (where applicable) and the standards of the independent scientific book series. Peer-review comments identified in the formal review process were addressed. In addition, the State of Colorado reviewers provided voluntary, unsolicited comments on the Garton et al. chapter. That chapter has no USGS authors. The authors of that chapter addressed the official peer-review comments, as well as the State of Colorado comments, to the satisfaction of the USGS associate editor of the volume and Editor in Chief of *Studies in Avian Biology*. The Acknowledgments section of this chapter references the contribution of four anonymous reviewers critical of the authors' approach and analysis methods.

III. “F. The Monograph Was Not Based on the Best Available Science”

At the time of publication, the USGS-authored chapters and other chapters in the monograph constituted the best-available science on the ecology and conservation of Greater Sage-Grouse and its habitats. This is reflected in the favorable reviews and awards the monograph received. For example, The Wildlife Society recognized the monograph with a publication award in 2012 for “excellence in scientific writing...[and] characterized by originality of research or thought and a high scholastic standard in manner of presentation.” Many individual chapters also have been cited in the scholarly literature. Further, the monograph was expansive in its consideration of existing information as a foundation of new analyses and interpretations presented. This is revealed by the presence of approximately 1,600 literature citations in the monograph.

III. “G. The Monograph is Biased and Lacks Objectivity”

As described above, USGS–authored chapters and the monograph as a whole are not biased and meet the standards of objective science.

IV.A-O. “Specific Issues with Chapters in the Monograph”

The Request lists a number of allegations for 14 chapters and the Introduction (which the Request erroneously identifies as a chapter). These allegations include chapters that do not have USGS authors, and as described above in III.A, the USGS considers only chapters by USGS authors as USGS information.

The specific chapter allegations contain numerous errors and mischaracterizations. Also the evidence cited by the Petitioners in Exhibits A, B, and C is not persuasive because these exhibits are in the observation of the USGS best characterized as opinion (see III.E.5). Furthermore, differences of opinion about findings in a scientific publication are usually addressed in follow-up publications in peer-

reviewed scientific literature. When there are allegations as egregious as those stated by the Petitioners, the process is for the challengers to submit a manuscript substantiating these views to the same journal, which then invites the authors of the original product to respond. If the challenged manuscript has scientific merit, then it and the original author response are published in a subsequent issue. That has not occurred for any of the chapters in the monograph nor have others (beyond the DQA Request submitted by the Petitioners) challenged the legitimacy of the science via that process.

The Petitioners' Request broadly characterizes the chapter issues as ...“significant mischaracterization of previous research; substantial errors and omissions; lack of independence in authorship and peer review; methodological bias; and a lack of reproducibility.” Each of these topics is addressed below.

- Chapters do not contain significant mischaracterizations of previous research. Information from previous research is documented with citations that reveal accurate representation of the information. In a few instances, a chapter does not contain the citation that is allegedly mischaracterized. More generally, it is surmised that the Petitioners misunderstood the way the cited information is used. For example, referring to the chapter describing the ecological influence and pathways of land use in sagebrush, the Request alleges that authors did not accurately represent the studies cited; instead, substituting their own values to delineate a hypothetical “effect areas.” Conversely, the authors used the cited sources to document the information they used to estimate the area for ecological effect. In another instance, referring to a chapter about pattern and process in Greater Sage-Grouse population and sagebrush landscapes, the Request alleges that the authors perpetuate a myth about the distance between Greater Sage-Grouse leks, and therefore, populations. Conversely, the authors present the range of dispersal distances reported in the literature and note the general lack of data.
- Chapters do not contain substantial errors and omissions. The monograph, with approximately 1,600 citations, was expansive in its consideration of existing information as a foundation of new analyses and interpretations presented. Some of the alleged omissions are due to misunderstanding of how information is organized in the monograph. For example, in several instances, the information allegedly missing is presented in another chapter, and the index of the book assists in finding this information. In other instances, the Petitioners seemingly misunderstood what the authors stated.

The chapter by Garton et al. describing Greater Sage-Grouse population dynamics and probability of persistence is alleged to be the most flawed. This chapter does not have USGS authors. The peer-review process of this, and other chapters, best refutes this allegation as it ensured that the quality of the information met the standards of the scientific and technical community. In addition to the two peer reviews that were standard for all chapters in the monograph, the chapter by Garton et al. also received unsolicited reviews from the Colorado Division of Wildlife. The authors addressed all comments and revised the manuscript accordingly. The USGS associate editor of the monograph then asked two statisticians with national and international reputations in modeling population dynamics or population viability assessments to review the original manuscript, the two standard peer reviews, the Colorado reviews, the authors' response, and the revised manuscript. Both of the statistician reviewers recommended publication of the chapter.

- The monograph does not lack independence in authorship and peer review as described above in Sections III A, D and E of the Request.
- Choices were made by chapter authors about methods to use for data analysis, and these choices were not made with a bias toward a particular outcome. Analyses are accompanied by explanations of methods. Specific allegations about methodological bias seem to be misunderstandings. For example, the Petitioners allege that authors of the chapter discussing influences of the human footprint on sagebrush landscape patterns did not address any error associated with model inputs or use statistical methods that address the error variance. In fact, lacunarity, the statistical metric used in this chapter, is a function of variance (of sagebrush pixels) relative to the mean within different sizes of moving windows across a landscape (formula and description p. 258), and therefore, provides information on error as part of the metric. The primary input, mean patch size of sagebrush, is presented in Table 13.1 of the chapter, along with standard errors for each management zone. Further, the peer-review process included assessment regarding methods chosen and potential biases, and the review process for the monograph was rigorous (see III.E above).
- The science in the monograph is reproducible. Refer to III.B (above) for an explanation of the reproducibility of the science presented in the monograph.

V.A-G. “The Monograph Misrepresents Several Key Issues”

The USGS-authored chapters and the monograph as a whole do not misrepresent the issues listed in the Request. Specific to the particular issues cited under this section in the Request:

- All analyses of Greater Sage-Grouse populations’ growth/decline and genetics use clearly described and peer-reviewed methods, and authors carefully characterize the conclusions drawn.
- The monograph recognizes that natural fluctuations occur in Greater Sage-Grouse populations.
- The monograph presents a conceptual framework for evaluating the effects of predation and considers why it is not currently possible to understand relationships among habitat and population characteristics of Greater Sage-Grouse and the predator community of an area.
- Harvest through hunting is 1 of 15 major threats reviewed.
- The development and management of oil and natural gas and implications for Greater Sage-Grouse are discussed in multiple chapters.
- Multiple chapters consider livestock grazing, including a discussion in one chapter of possible benefits of livestock grazing for Greater Sage-Grouse habitat.
- The monograph acknowledges State, local, and private conservation efforts, for example specific reference is made to a memorandum of understanding among members of the Western Association of Fish and Wildlife Agencies for the conservation and management of Greater Sage-Grouse in North America.

VI. “The DQA Applies to the Monograph”

The DQA applies to chapters of the monograph that have USGS authors. Further as explained in III.E, the peer review conducted was sufficient to meet the requirements of the DQA.

VI. “A. Information Dissemination Product”

The USGS did not publish the monograph. The University of California Press is the publisher, acting under the direction of the Cooper Ornithological Society. The versions of each chapter provided to the

USFWS prior to publication by the University of California Press for the Cooper Ornithological Society stated the following disclaimer, “This manuscript contains unpublished, peer-reviewed, scientific information. It has been accepted for future publication in a special volume of the Cooper Ornithological Society scientific series "*Studies in Avian Biology*." No waiver of proprietary rights to the information is granted by this release on the part of the Cooper Ornithological Society and its publisher, the USGS, or the author(s) of the manuscript.”

VI. “B. Third-Party Information”

USGS guidelines do not conflict with the DQA or with OMB and Department of the Interior Guidelines in regard to third-party information such as those chapters with authors other than USGS personnel. Revision of USGS guidelines is not appropriate in the context of this Request.

VI. “C. If Uncorrected, the Monograph Will Cause Substantial Harm”

The monograph consists of the research findings of the USGS, other Federal and State agency, university, and non-governmental scientists. The science is sound, and meets standards identified in the DQA for quality, integrity, objectivity, and utility. The monograph does not make recommendations for policy or management decisions.

VI. “D. The Monograph is Highly Influential Information”

As described above, the monograph was not designated by the USGS as "influential" or “highly influential” because a) USGS considered only the chapters authored by USGS authors as USGS information; b) the ultimate outlet for all chapters was a scientific book series rather than a USGS publication; and c) the USGS could not reasonably determine that any given chapter would have a clear and substantial effect on important public policy decisions.

VI. “E. Petitioners Are “Affected Person(s)” Qualified to Bring a DQA Challenge”

The USGS does not have a position on whether the Petitioners are “affected persons based on information about the development of this publication as the stated above.”

VII.A-D. “The Monograph Does Not Comply with Other Federal Standards”

As described above, the monograph was prepared with the highest standards of scientific integrity, objectivity, and transparency. The chapters authored or co-authored by USGS scientists complied with OMB, DOI, and USGS standards. The USGS mission (to provide impartial information on the health of the nation’s ecosystems and environment, the natural hazards that threaten the nation, the natural resources society relies on, the impacts of climate and land-use change, and the core science systems that help the USGS provide timely, relevant, and useable information) remained uppermost during the process of developing this publication.

VIII. “Conclusion”

Assertions presented in the conclusion are redundant with those addressed in the above sections.