



# United States Department of the Interior

U.S. GEOLOGICAL SURVEY  
Reston, Virginia 20192

January 29, 2015

In Reply Refer To:  
Mail Stop 911

Kathleen Sgamma  
Western Energy Alliance  
410 17th St., Ste 700  
Denver, Colorado 80202  
(303) 623-0897  
[ksgamma@westernenergyalliance.org](mailto:ksgamma@westernenergyalliance.org)

Dear Ms. Sgamma:

The U.S. Geological Survey (USGS) received the July 30, 2013 email from Alyson Meyer Gould of the firm Holsinger Law, LLC, Denver, CO ([www.holsingerlaw.com](http://www.holsingerlaw.com)) regarding an "Information Quality Act (IQA) Request for Correction of Information" about a U.S. Geological Survey (USGS) publication titled "Modeling ecological minimum requirements for distribution of greater sage-grouse leks: implications for population connectivity across their western range, U.S.A." The request was submitted on behalf of Western Energy Alliance and you were identified as the point of contact for the USGS communications about the request. Documentation about the request may be viewed on our Web page at [http://www.usgs.gov/info\\_qual/greater\\_sage-grouse\\_leks.html](http://www.usgs.gov/info_qual/greater_sage-grouse_leks.html).

The attached response document recaps three comments about the publication and provides our response to them. I have reviewed the evaluation of your request, which did not cite any specific corrective actions for the publication, and find the USGS response to the comments to be sufficient in relation to the USGS Information Quality Guidelines.

The right to appeal is available if there is any dissatisfaction with our decision regarding this request. The appeal should be addressed to the Director, USGS, and it must be submitted to the USGS (via email to [InfoQual@usgs.gov](mailto:InfoQual@usgs.gov)) within 21 calendar days of the date of this final USGS response. Additional information on the procedure for submitting an appeal is found on the USGS Information Quality Guidelines Web site at [http://www.usgs.gov/info\\_qual/](http://www.usgs.gov/info_qual/), under section IV, 4.

Thank you for your interest in this product.

Sincerely,

*for* Anne E. Kinsinger  
Associate Director for Ecosystems

Attachment

**Attachment: USGS Response to IQA Request for Information Correction**  
([http://www.usgs.gov/info\\_qual/documents/initial\\_inquiry\\_073013.pdf](http://www.usgs.gov/info_qual/documents/initial_inquiry_073013.pdf))

No specific requests for corrective action of information in the publication were made, however, the USGS responses to three focal comments in the Western Energy Alliance (WEA) request are below.

**1. WEA Comment:** *Informational Deficiencies--Request for information regarding the peer review process employed for the report.*

**USGS Response:** The peer review process followed for this product is consistent with USGS Survey Manual (SM) policy chapter SM 502.3 (<http://www.usgs.gov/usgs-manual/500/502-3.html>).

All of the specific informational deficiencies stated in section III, pages 5-7 of the WEA IQA request for correction were previously requested by the WEA under a Freedom of Information Act (FOIA) request, USGS-2013-00131. The USGS responded to the WEA's FOIA request, 2013-00131, and provided records responsive to their request. The USGS response to the WEA's FOIA request, 2013-00131, provided contact information regarding the peer reviewers, documents related to the peer reviewers' review, information about the lek data, copy of a funding agreement, and comments on analytical methods. The USGS and WEA resolved FOIA request 2013-00131 through a settlement of the FOIA litigation.

**2. WEA Comment:** *The Modeling Study is a highly influential report.*

**USGS Response:**

We believe the USGS process provided satisfactory peer review of this report. In conducting its science, the USGS strives always to provide unbiased, objective, and credible scientific information. To ensure objectivity, the USGS peer review standards require a minimum of two independent reviews for every USGS scientific publication as described in SM 502.3. In the case of this report, three such reviews were conducted. Research managers and independent scientists assess the author's responses to peer reviewer comments to ensure those responses are adequate. Approval to publish USGS information products containing new research or interpretive information following peer review is granted by Bureau Approving Officials in the USGS Office of Science Quality and Integrity. For information products containing previously published information approval is granted by Science Center Directors. This approval process provides a final check to ensure that the appropriate reviews occurred and that comments from the review were adequately reconciled (refer to SM 205.18 at <http://www.usgs.gov/usgs-manual/200/205-18.html>).

The report was not designated by the USGS as “influential” under the Office of Management and Budget provisions. At the time the draft manuscript was submitted for peer review, it was considered to be a routine species-habitat modeling assessment that would contribute scientific findings to an important natural resource issue, but it would not be the sole source of information used in a management or regulatory action. When and if a Federal agency chooses to rely on the publication as the basis for a management or regulatory decision, that Federal agency would be responsible for commissioning additional peer review as necessary. Such peer review would be in addition to USGS’ required peer review, consistent with SM 502.3, and peer review by the scientific journal in which the article was published (Ecology and Evolution).

An examination of uses of the USGS report since its publication by other entities is consistent with this expectation. The USGS report appears to have been cited in 17 documents. A majority of those documents were scholarly journal articles or academic theses. The report also was cited in two instances of federal correspondence and in one instance of a federal technical report that related to greater sage-grouse. However, in those situations it was just one of multiple sources cited as scientific evidence in support of those authors’ conclusions (i.e., the USGS report was not the sole source utilized in the discussion). The federal technical report (<http://www.treesearch.fs.fed.us/pubs/46762>), disseminated by the U.S. Department of Agriculture, U.S. Forest Service was subjected to a peer review in accordance with that agency’s policies.

**3. WEA Comment:** *Third-party data.*

**USGS Response:** The USGS supports its standards and practices with regard to verification, use, and acknowledgement of third-party data. The third party information used in the subject report (available from <http://pubs.er.usgs.gov/publication/70045558>) was treated in accordance with Section III.5 of the USGS Information Quality Guidelines ([http://www.usgs.gov/info\\_qual/](http://www.usgs.gov/info_qual/)). Nonetheless, USGS has addressed WEA’s concerns about transparency by providing the data WEA requested through the FOIA process.