

Comments from Members and Consultants of the SAB Committee on Valuing the Protection of Ecological Systems and Services (C-VPESS) on the 3/09/07 draft report for discussion at the 4/03/07 C-VPESS public teleconference call.

Comments received as of 8:00 am Tuesday, April 03, 2007.

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A. General Comments

Comments from Dennis Grossman

As I was reviewing these sections, there were a number of times where I felt we were losing our broad committee focus on the values of Ecological Systems and Services. There is a tendency for some authors to only focus on the value of ecological services, and not give equal attention to the value of ecological systems. We will need to have the final editor watch carefully for this as we prepare final drafts.

B. Valuation in Collaborative Partnerships (Part 2, Section 7, pp. 146-166)

Comments from Bill Ascher

Part 2, Section 7:

p. 146 line 5: No verb in sentence

p. 148 table: presumably “APA” is the American Planning Association”; it should be spelled out.

p. 153, line 30: redundancies with previous section describing the Chicago Wilderness group.

p. 155, lines 11-14: Is this really relevant to the development and use of valuation techniques?

p. 158, line 24: It seems a bit far-fetched to invoke an example of Chinese forest habitats on water flow to apply to Chicago. Are U.S. cases unavailable?

p. 159, line 26: Cost-effectiveness analysis does require valuation insofar as virtually any intervention will change the composition of the ecosystem, reducing some elements as others

increase. This is almost recognized in the next paragraph, but it would be unfortunate to leave the reader with the conclusion that cost-effectiveness analysis does not require valuation.

p. 161: The several mentions of the lack of reliability of stated preference methods implies that there are other methods without such problems, in turn implying that revealed preference approaches are more reliable. Since revealed preference approaches are subject to the risks of measurement error and model misspecification, this is an unfortunate implication, especially since a long list of revealed preference studies is provided later in the section.

Comments from Terry Daniel

This, too is a well written section. I was struck by the similarity of some of the valuation/decision exercises presented to the conservation value assessment approach described in Part 3, Section 2.2. Are the analyses described in 7.2.3, 7.4.1 actually an example of the application of that method? Or is the method described in Part 3, Section 2.2 a special case of this general GIS-based ecological value assessment approach? Of course there are also several examples of what might be termed Mediated Modeling (part 3, Section 5.2 or Deliberative groups, Part 3, Section 5.1.

The Portland example seems especially relevant to C-VPES and our report. However, there is little information about how ecological analyses were in fact interfaced with economic valuations and there is not information about how values for recreation and amenities or for changes in human health were actually determined. Similarly, the graphical interface that allowed publics to interactively run scenarios and see ecological and economic/value impacts is intriguing, but not described. If these examples did in fact did develop and apply such models and communication systems, they should provide and excellent opportunity for C-VPES to illustrate with actual data and decisions how some of the methods we describe in Part 3 have been used.

The advantages of monetary valuations described on p 160-line 4-19 seem to be the standard claims, but it might be useful and more realistic to add a sentence or two acknowledging the assumptions of substitutability, commensurate scales, aggregation of individual values, etc on which these claims must rely.

Comments from Dennis Grossman

Clearly written.

For the Portland example, it would be beneficial to describe the role EPA is playing as well as the role that EPA could/should play.

The numbering needs to be fixed regarding the Chicago Example. The current 7.4, really is a subset of 7.3, so should be 7.3.1, etc.

I like this section, but I would like to see a clearer statement of EPA mandates and responsibilities that points to the necessity to build capacity and engage in these partnerships.

Comments from Lou Pitelka

In the title, what is the difference between “stakeholder involvement” and “public participation”? It is not clear in the following discussion.

I had a lot of trouble with the way the material in section 7 was divided up into subsections. I kept having to look back to try to figure out the logic of the flow of topics. I hope the comments that follow are understandable.

The material covered in all of section 7.4, as well as in 7.5 and 7.6 seems as though it should fall under section 7.3. Section 7.3 introduces the general topic of using valuation to support regional decision-making in the Chicago example. Sections 7.4, 7.5, and 7.6 provide the details and all deal with the Chicago Wilderness example, and so should be sub-sections under 7.3.

Subsection 7.4, pages 153-164. It seems as though the four paragraphs, from page 153, line 28 to page 155, line 14 should be a separate subsection, i.e., 7.4.1. This material is not an introduction to all of 7.4, but rather only covers stakeholder involvement or public participation. The current sections 7.4.1 and 7.4.2 address other topics and should stand as equivalent subsections. Perhaps there should be a general introductory paragraph covering all of section 7.4, followed by subsections 7.4.1, .2, .3, .4, and .5.

Page 154, line 20. “species” should be “workshops”.

Page 154, line 25. What does “remaining areas that incorporated fragmentation” mean?

Page 155, lines 16 to page 156, line 12. Since NatureServe methodology is covered in detail elsewhere in the report, perhaps it does not need so much detail here.

Page 162, line 21. I got confused by these paragraphs that begin with topics, not complete sentences. Shouldn't “Valuation of Water Quality and Quantity” be underlined, to correspond with “Valuation of Species Conservation and Ecological Systems Conservation” on page 160 and “Valuation of Recreation and Amenities” on page 163?

I also was confused with the different approaches to discussing “Valuation of Species Conservation and Ecological Systems Conservation” and “Valuation of Recreation and Amenities” vs. “Valuation of Water Quality and Quantity”. The latter simply lists two values associated with water quality and quantity, while the other two subsections are more general discussions.

Page 162, line 24 to page 163, line 3. What about water quality? Why does this subsection only discuss studies of valuing water quantity?

Page 164 and 165. Couldn't sections 7.5 and 7.6 be consolidated into one section, i.e., “Summary and Lessons Learned”? The lessons learned really constitute part of the summary.

Page 165, lines 19-21. Ecological processes occur and can be studied at all scales. For the purpose of valuing ecosystem services, it may be true that a regional scale is the most logical.

However, the regions (e.g., a watershed) that are most appropriate and convenient for analyzing ecosystem services probably do not often correspond with the political regions (e.g., the Chicago area) that most often would be a focus for such partnerships. Thus, there is a potential disconnect here between what actually happens (groups in a particular political region come together) vs. what makes most sense ecologically.

C. Valuation for Site-Specific Decisions (Part 2, Section 6, pp. 109-145)-

Comments from Bill Ascher

Part 2, Sections 6.3 and 6.4: There is considerable redundancy in the introductory materials of these sections.

p. 119, line 5: the term “intrinsic” is vague here; should it be “existence value”?

p. 120, line 12: the term “While” needs to be replaced with “However,”.

p. 131, line 17: The NRDAP acronym is introduced without definition.

p. 137, line 7: Here again there is a near-condemnation of stated preference approaches as if they were the only ones subject to error.

Comment from Terry Daniel

This section is very well written. I hardly recognize it. Do we have a bone fide English major in our midst? I would suggest that the current section 6.4, stating recommendations that will later be restated and illustrated might better be consolidated into a table (just listing the recommendations) and then the representation of recommendations with case-study illustrations in section 6.5 would not seem so redundant.

Figure 7 is quite intricate and potentially important to the report, but there is not enough description and discussion of the features of the figure/model for most readers to get the full message. A little more help in interpreting the figure would be useful.

In a repeat of one of my pet themes, I would suggest that conceptual model recommended be referred to as an “ecological-social value model” rather than an ecological-economic model (e.g., on p 118-line 18, p 122-line 3, p 123-line 3, p 124-line 13, p 134-line 27,), to more explicitly refer to and reinforce our expanded concept of value assessment. Similarly, on p 129-line 2 & 3, “...economists and other social scientists to estimate values will likely ...” In this context, some of us are working to find a better label for “Social-Psychological or “attitude” methods” (non-monetary is not an alternative).

P 133-line 10 – 23 is repeated verbatim on p 137-line 3-17. The list of methods on p 133-line 27-29 is too generic to provide much guidance to EPA analysts. Perhaps fewer methods could be mentioned, but with more description of how they might be used in this context.

The draft does not commit to where the “boxes” describing the case studies will appear, but it seems clear that they need to appear early in the session so that the context of the examples presented is understood. Otherwise, the cases are used quite effectively to illustrate the main points of site-specific value assessments.

P 117-line 14, format for Recommendation 3

P 136-line15 “input-output models”... This term was introduced by someone who might not know what he is talking about (not to name names, but his initials are TD), so someone with the requisite knowledge of economic taxonomies should confirm that this is the correct term for the analysis cited.

Comments from Rick Freeman

p. 117, Recommendation #3 c): First, I don't understand the inclusion of "Bayesian" here. How does Bayes help to "sort, weight, etc."? And second, shouldn't the list of approaches include economic methods, social-psychological, etc? Don't focus just on MAUT.

p. 128 +: This seems to be more about Recommendation #4 on p. 117 then on Recommendation #3 c).

p. 109, line 21/p. 110, line 17: Wilson (2005) is not in the reference list. Is this Wilson (2004)?

p. 135, line 8: Jonathan Roughgarden (2001) is not in the reference list.

Comments from Dennis Grossman

The title should better reflect the specific types of sites that are a focus of this section. There are many of us who would not translate “Site Specific” to remediation of remediation and redevelopment of previously contaminated sites. Title suggestions are: Valuation Decisions for Historically Contaminated Sites or Valuation Decisions for Superfund Sites.

This is a very well written section that provides pragmatic advice to the Agency.

Comments from Lou Pitelka

I have not finished reading this section.

My one comment is that “ecological” needs to be changed to “ecosystem” whenever it is used with “service” or “services” in order to be consistent with the rest of our report. On page 114, both terms, “ecological services” and “ecosystem services”, are used, implying that they are different.

Comments from Paul Risser

Page	Line	Comment
110	25	Is it really that early focus can result in more ecological service or is that early focus can more completely identify potential ecological services that can be exploited or developed in the remediation and restoration phases?

113		Community involvement in the site characterization step is not entirely clear. Is the involvement designed to assist in actually characterizing the site, to help identify possible uses, to identify important ecological services or to predict the benefits based on the site characterization?
115	20 31	Not entirely clear what is meant by "those outside" Yes, it is important align decisions and actions with what matters most to people affected and/or involved, but the goal of a comprehensive approach is designed to capture ecological services that are inherently important whether or not people believe they matter.
117	20	The "double counting" issue may be a red herring in the sense that the technique should measure the production function, not all the intermediate steps. For example, hydroelectric dams provide multiple services but they are not "double counted" because valuation is done on the production functions such as electricity production, recreation, flood control, etc.
122	8	If we use Figure 7, we will need to provide labels and a description or rationale for the boxes, especially those whose depiction is isolated, e.g. ecological element.