



United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, N.W.
Washington, DC 20240

NOV 13 2013

Honorable Rob Bishop
Chairman, Subcommittee on Public Lands and Environmental Regulation
House of Representatives
Washington, D.C. 20515

Dear Chairman Bishop:

I am writing in response to your letter dated September 6, 2013, concerning the National Park Service's comments on the Bureau of Land Management's proposed well stimulation and hydraulic fracturing rule on Federal and Indian lands. The inclusion of a quote from an article on the *New York Times*' Op-Ed page was inappropriate. Citations to peer-reviewed scientific studies should have been referenced to support the technical comments that were submitted. In addition, the comments did not receive appropriate review and were not signed. For these reasons, I have requested that the comments be withdrawn from the record.

As requested, below are answers to your specific questions.

1. *What are the National Park Service, Department of the Interior, and the Obama Administration's protocols for quoting editorials and news articles in official comments?*

There is no explicit policy on quoting editorials and news articles in official comments. While citing news articles may be appropriate in specific circumstances to illustrate a point or to highlight an issue, quoting an editorial piece was not appropriate in the context of these technical comments. The National Park Service (NPS) should have referenced peer-reviewed scientific literature.

Please explain how the Service's reliance on this opinion column is consistent with the 2012 scientific integrity policy.

The National Park Service is not relying on this, or any other opinion column, as a basis in decision making. While the quote should not have been included, the comments clearly documented the source of the quote as being from a July 29, 2013, *New York Times* Op-Ed article, not from a scientific journal. This clear documentation of the source as an Op-Ed article is consistent with provisions of NPS Director's Order 79: Integrity of Scientific and Scholarly Activities, which requires differentiation among facts, personal opinions, assumptions, hypotheses, and professional judgment.

2. *Did you personally review the Service's comments before official submission?*

I did not, nor did anyone from management, review the comments. They are unsigned and were erroneously uploaded to regulations.gov. The handling of these comments was contrary to National Park Service protocol and the staff that sent out the comments was not clear on the appropriate review procedures. We have taken steps to ensure that all staff are informed of and follow appropriate review procedures for the handling of all future correspondence.

Were you advised about the scientific uncertainty associated with the Ingraffea opinion column? If yes, please provide copies of all documents used to brief Service officials about the comments, including the Service's decision to base its comments on the Ingraffea column.

As noted above, the comments did not undergo management review. As a result, there was no discussion about their content at a management level. The opinion column was cited for illustrative purposes and was not the technical basis for the comments.

3. *Did other federal agencies or Departments, such as the Office of Management and Budget, review the Service's comments? Please provide any and all documentation between Service employees and the other federal agencies, departments, or official as they relate to the official comments.*

The National Park Service comments did not undergo review by other federal agencies or the Office of Management and Budget.

4. *Does the Service plan to withdraw these comments given the inaccurate statements and data the Service used to make assumptions and conclusions?*

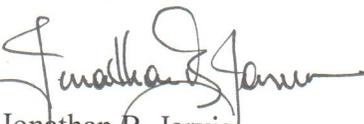
As noted above, the National Park Service has already requested that the comments be withdrawn. The comments did not undergo management review, they were not on official letterhead, and they were not signed.

5. *How does the Service plan to rely on sound scientific information for future official comments?*

The National Park Service bases its decisions and official comments on the best available science and adheres to its policy on Integrity of Scientific and Scholarly Activities. As mentioned above, we have also implemented procedures to ensure that our comments are provided with the appropriate level of review and signature to ensure that this does not happen again.

Thank you for your interest in maintaining the scientific integrity of government decisions.

Sincerely,



Jonathan B. Jarvis
Director