

Comments from Member of the SAB Committee on Valuing the Protection of Ecological Systems and Services (C-VPES) for Teleconferences on November 19 and 20, 2007 – (Alphabetical Order)

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Comments from Dr. Gregory Biddinger

(For section 6.2, language for describing the gap between traditional and the CVPES approaches.) Lets try the following sentences inserted on page 145 line 10 after the words " have been identified".

..... The process outlined in figure 8 and the text that follows, starts from a premise that at the onset we need to define what we want the site to be after remediation and redevelopment and need to identify what ecological services are to be preserved, restored or enhanced for use by the local community in that future use scenario. This differs from the more traditional practice which initially focuses on the type, degree and extent of chemical contamination in various media on the site and asks what human and ecological receptors are currently exposed and therefore at risk under current chemical conditions. In the more traditional approach, the data collection for the site characterization step captures the degree and pattern of chemical contamination in various media across the site but does not collect information about the ecological condition of the site nor the value of any services associated with the site in its current or proposed future conditions. Additionally, in the traditional approach the conceptual model that defines the exposure pathways to key receptors and therefore guides the design of the risk analysis is based on assumptions under current conditions rather than future conditions. This can lead to a risk assessment that selects receptors which are sensitive under current conditions but may not be sensitive nor important receptors under alternative future use scenarios. Additionally following this logic focuses the remedy evaluation and selection process step on controlling the risks under current use. In the end the traditional approach is assuming that risk reduction and management are the ultimate performance goals rather than optimized reuse value for the community. Such an approach may leave the community feeling the risk is gone but not clear on the value gained by the clean-up. Integrating future use considerations and a focus on value generation will lead to better outcomes which will satisfy the public. To accomplish this metamorphosis of the tradition it is essential

to find ways to introduce estimates of value and ecological service into management strategy and associated analytical processes.

(break paragraph here).

As is clearly shown,

Comments from Dr. Terry Daniel

The writers are to be congratulated for achieving a general and eclectic description of criteria for evaluating the appropriateness of different methods for assessing the value of ecosystems and services. As is duly noted, specific criteria will depend upon the specific contexts, including the types of values that are at issue and the roles that these values are to play in decision making. There is a danger that the guidelines offered may be viewed as too general to be of much use in any particular application, but the recommendation that the Agency make the selection and evaluation of assessment methods an explicit component of any policy deliberation and decision making process seems to go about as far as is possible without specifying the particular context.

page 1, line 21-22

“... in the specific **valuation** context **at-hand** of assessing the values of ecosystems and services, where no methods have yet been tested by extensive experience.”

page 2, line 4-6

“... whether **a** survey methods **in general** can appropriately ... specific survey was actually properly **and** executed so as to estimate or elicit the **particular** intended values.

page 2, line 31

“... value where possible, **based on OMB’s current interpretation of the type of values that were intended by Executive Order 12866 and 13422.**

page 3, line 18

“... value, such as **only biodiversity or human health or individual willingness-to-pay.**

page 3, line 19-24

[What is meant by “estimate or elicit values **directly**”? Does this assume (contrary to substantial research literature) that people can be expected to know what they value and can express this value (these values) accurately when asked directly to do so? Does this section imply that “revealed preferences” (an indirect reflection of values) should be assumed to be less valid than “expressed preferences” (a direct statement of values)?]

page 4, line 13

“... changes being valued, **as well as the implications of those changes for themselves and for others.**”

page 4, line 23

“... similar value estimates? For methods that claim to achieve an absolute measure of value, replication requires a “match” in indices, while for methods that claim only a relative measure of value replication can be demonstrated by a correlation between indices.

[This may be too fine a point for this context (and too poorly made by the sentence offered), but some of the methods we recommend do make stronger claims than others on the extent to which measures of value are intended to be absolute and transituational. For example it would not generally be considered a successful replication if w-t-p (in dollars) measures differed substantially in absolute magnitude, even if the measures showed a high positive correlation across some common set of policy alternatives. On the other hand, measures based on rating scales are not generally required to show an absolute match, and a high correlation across the relevant range of policy alternatives is accepted as an indication of successful replication.]

page 4, line 24

“... should be stable (i.e., reliable) in the sense...”

page 4, line 28 to page 5, line 2

[This point potentially conflicts with the point made above (page 4, line 6-8) regarding the goal of determining “well-informed” values. If, as we have often assumed/declared, the general public is often not well-informed about many of the ecosystems/services values that EPA seeks to assess, then the values expressed by a well-informed individual cannot be “representative” of public values. The earlier section made clear that the C-VPESS believes that EPA policy should be based on assessments of values that the public “would hold if it were well informed,” i.e., the target of assessments should be the values of a hypothetical well-informed public, not the actual (ill-informed) public. This section does not clearly maintain that distinction.

While on this point (again), there might be contexts in which the EPA would want to assess the actual values of the public as they exist—whether well- or ill-informed. In addition, it is not always easy to determine who is “well-informed” and who is not, as there can be legitimate disagreements among very highly trained scientists/experts (which expert opinion should set the standard for a well-informed public?) and it is quite common for people who are equally well informed (and substantively in agreement on the facts) to disagree vehemently on the “values.” C-VPESS has debated this issue in a number of forms and a number of ways, and we are not likely to resolve it in this final document. Perhaps we could acknowledge the distinction and admit that the values of well-informed publics may be more relevant in some contexts and the values of ill- or variously-informed publics may be more appropriate in other contexts.]

page 5, line 9-11

[The point of this paragraph is important, but it could be misinterpreted (or misused) to encourage further reliance on ill-fitting benefits transfers and other handy-but-inadequate and inappropriate data about ecosystems/services values, and discourage investment in the development and trial of a wider menu of methods as we have recommended.

Because assessments of the value of ecosystems/services is still relatively new, the Agency, and their funders and regulators, must expect to spend a bit more time and money developing, testing and applying new methods to get new value-relevant data.]

Comments from Dr. A. Myrick Freeman

Here are my comments on the Decision Science Write up. I am assuming that it is the same as what was sent out in October. I haven't had time to read this version to confirm that.

1. This is a clear statement;
2. it looks as if it is supposed to go in Chapter 4. But if so, it is too long. So perhaps it should replace the material now in Appendix B..
3. In any case:
 - it does not include a critical assessment of strengths and limitations;
 - it does not mention the potential influence that the choice of a facilitator can have on the results;
 - it doesn't explicitly link the method to the valuation task, that is, to measuring the contribution to human well-being;
 - its focus is on the single decision maker; but the valuation task as we see it is likely to involve a group of diverse stakeholders who might not always reach a consensus. This problem should be discussed. See the paper by David Schkade, Cass Sunstein, and Reid Hastie, Chicago Law and Economics Working Paper 06-19 that I circulated many months ago. This paper should be cited.

Comments from Dr. Louis Pitelka

I read the new sections but do not have any comments.

Comments from Dr. Paul Slovic

1)p3,line5.I strongly object to the term "true value".Better to say that validity refers to the degree to which a method measures what it is supposed to measure.Perhaps "underlying construct" was what was intended here. The underlying construct of "value" is not directly observable but can be estimated through the use of appropriate,ie valid, methods.

2)p3,lines19-24.I object to the idea that methods that elicit values directly can be expected to have greater validity than those that measure something correlated with value(such correlation is the essence of construct validity) or that use a constructed scale. Every method entails the construction of value in some way! What is needed is a method that constructs value in a logical, defensible way. That is what multiattribute methods aim to do.

3)p4,lines 21-26. Yes, replicability and stability are important. A related but equally important criterion is "procedure invariance". Logically equivalent methods of measuring value should lead to equivalent results. Willingness to pay methods, for example, sometimes fail this criterion. People have been found to be willing to pay more for state A than state B, but to claim that B is more valuable to them.