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To: Mabel E. Echols OMB\_Peer\_Review/OMB/EOP

cc:

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- PeerReview.wpd

October 3, 2003

[OMB\\_peer\\_review@omb.eop.gov](mailto:OMB_peer_review@omb.eop.gov)

Attn: Dr. Margo Schwab

Our association of contract logging and log trucking businesses offers the following comments on your proposed "Peer Review Standards For Regulatory Science:

1. A simply stated objective should be included; i.e. "To assure that the science used to support regulatory action is of a quality that would merit it's publication in a reputable journal".
2. In Section 2, first paragraph, you accept nearly any journal as providing peer review. This creates some of the same problems as "best available science". We suggest you add the qualifier "reputable" and then ask the editors of several respected journals to meet and recommend criteria to meet the "reputable" label.
3. In Section 3, we suggest you include both "blind" and "hostile" peer review. Blind review lets the peer reviewers examine the work without knowing its author - often fostering greater objectivity. On contentious subjects, a hostile review is more likely to shake out any problems with the science than would the normal, more benign review - saving a lot of later grief.
4. The Bulletin needs to include at least a summary of the penalties for violating its provisions as well as an agency's peer review policy. It also needs to identify the person or position who is to be held accountable when there is a violation.

Thanks for the opportunity to comment on this important subject.

Respectfully,

Ed Ehlers, Executive Director  
Associated California Loggers  
555 Capitol Mall, Suite 745  
Sacramento, CA 95814

(916) 441-7940  
Callog1@cs.com