

MEMORANDUM FOR

COMMANDER, NORTHWESTERN DIVISION, P.O. Box 2870, Portland, OR, 97208-2870

SUBJECT: Data Quality Act Request for Correction from Ms. Nina Bell, Executive Director, Northwest Environmental Advocates, Portland, Oregon 97212-0187

1. Enclosed please find a request for correction (RFC) under the Data Quality Act, from Ms. Nina Bell, Executive Director of the Northwest Environmental Advocates (NWEA), concerning the U.S. Army Corps of Engineers (USACE), *Final Supplemental Integrated Feasibility Report and Environmental Impact Statement (FSEIS) for the Columbia River Federal Navigation Channel Improvement Project*, published January 28, 2003, and the *Columbia River Channel Improvement Project Addendum*, published November 2003, by the Portland District. NWEA challenges certain information, data, analyses, and conclusions drawn in the aforementioned documents and requests correction because, they conclude, it is not accurate, clear, complete, or unbiased. They want DoD to immediately disavow the analysis, withdraw the FSEIS, and cease distributing or relying upon it. NWEA further requests that the Corps not disseminate any further substantive information regarding the economic costs and benefits of the channel deepening project until such time as an independent review is obtained.
2. The Data/Information Quality Act (the Act) requires agencies to ensure and maximize the quality, objectivity, utility, and integrity of information they disseminate to the public, and allows the public to question the information. Under the Office of Management and Budget (OMB) and Department of Defense (DoD) regulations, affected persons can seek and obtain correction of information that does not comply with OMB and DoD information quality guidelines, 67 Fed. Reg. 8452 (2002).
3. The Study proponent should review the information being challenged to determine whether the study meets the information quality guideline (IQG) requirements of quality, objectivity, utility, and integrity as defined by OMB and DoD. Specifically, the information must be accurate, clear, complete, reliable and unbiased. In reviewing the challenged information, you will need to identify the source of the information, any supporting data and models used, whether there is existing literature or other documentation supporting the data, whether the data was generated and the analytic results developed using sound engineering, statistical and research methods, how the quality of the information was assured (whether it was peer reviewed), etc. You should also determine whether the quality is appropriate to the nature, use, type, importance and timeliness of the information.
4. Please provide us with a draft response indicating whether you agree or disagree with the RFC and whether the requester has adequately supported his claim. If you agree with the RFC please provide a summary of your analysis and the steps to be taken to correct the information. If you disagree with the RFC, please explain how the information challenged meets the

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guidelines, based on your substantive review of the information quality (as discussed in paragraph 3) or procedural arguments. The draft response should be coordinated with your Counsel Offices.

5. Please forward your draft response to CECC-G (Attn: Richard Frank). We will review the draft response, add a paragraph describing the appellate procedures and coordinate the draft response with the Headquarters Office responsible for the program and OMB. The Director or Deputy Director of the responsible Headquarters Office will sign the response. The RFC and response will be posted to the public USACE Information Quality Act webpage at <http://www.hq.usace.army.mil/ceci/informationqualityact>.

6. If you have any questions concerning this process or anticipate that you will not meet the suspense date, please contact Mr. Richard Frank at 202-761-8557.

FOR THE COMMANDER

Encl.

For: David M. Houston
WILBERT BERRIOS
Director of Corporate Information

CF:
CENWD-OC
Craig R. Schmauder, OGC