



Linda Dansby

05/21/02 09:46 AM MDT

To: Jock Whitworth/PAIS/NPS@NPS

cc:

Subject: Revision to Lemon Seed EA based on SC-FWS comments

ATTORNEY-CLIENT PRIVILEGED

Jock: Attached is a table that Lisa's worked on listing each of the comments from the Sierra Club and FWS comment letters on the Lemon-Lemon Seed EA. You haven't shared the other comments, and we should probably include all the comments into the table just to make sure we're addressing all of the comments.

Preliminarily, "person(s) responsible" has been entered, but this is entirely up to you and your staff what you'd like me or other support office and GRD folks to do.



Lemon EA revisions.doc

SUGGESTED REVISIONS TO THE LEMON / LEMONSEED EA

(Draft 5/20/02 – Norby and Dansby)

REVISION NEEDED	COMMENTOR	PERSON RESPONSIBLE
PURPOSE AND NEED		
Page 1 – Add to the purpose of the EA to say that the purpose is to provide a decision-making framework...and to determine whether an EIS should be prepared.	FWS – P. 2, para. 3	park <i>Linda</i>
Page 2? Insert map showing an outline of the analysis area		Darrell
Page 2 – add info on NPS oversight of operations	SC – P. 4, para. 6)	~~Linda~~ Eddie?
Page 2 – Add additional information describing impairment	SC - P. 7, para. 4-6; FWS - P. 2, para. 3	Linda ~~Lisa~~ / Ken
Pages 8 & 9 – Revise issue statements for T&E species, Visitor Use and Experience, and possibly Wetlands	NA	Linda / Lisa
Page 9 – Remove section 1.4.3 and put the information in the Affected Environment and Environmental Consequences sections of the EA (This information should be supplemented with additional info from the park's files, FWS website, and in consultation with Donna Shaver <i>BRMD</i>)	FWS & SC See comments below under Envir. Conseq. Section)	park
ALTERNATIVES		
Page 17 – Clarify what is a “high pressure kick”	SC – P. 7, para. 7 FWS – P. 5, para. 2	Pat O'Dell
Pages 17 – 19 – Clarify that the operator is responsible for spills and clean-up, and that a Spill Control Plan is required and included in the Plan of Operations. Discuss that the operator must comply with the conditions of approval specified in the plan and FONSI. Describe the protocol for monitoring for turtles, grading etc. Explain where the excavated sand from the road through the pass will be stored.	FWS – P. 5, para. 7&8 SC – P. 8, para. 1 (road through dune); SC – P. 8, para. 2 (BNP's liability)	park <i>Eddie</i> <i>PK</i>

NPS DOCUMENT # 559

Page 19 – NEW ALTERNATIVES - Consider adding the following additional alternatives to the EA: -timing alternative – do not allow operation to occur until after turtle nesting season. -alternative access alternative - construct and use oil and gas access road behind the foredunes to mitigate impacts to the turtles (and other T&E species) and visitors (These may “fall out as alternatives considered and dismissed from further analysis. If so, describe them on page 25)	SC – P. 4, para. 9 (hire turtle expert); SC – P. 5, para. 3;	Park with assistance from Linda and Lisa (we could write the descriptions of the alternatives, the park could do the analysis)
Pages 25 & 26 - Add more information about why the alternatives were considered and dismissed from further analysis.	SC – P. 5, para. 3 (southern alt.); FWS – P. 2, para. 2	Park
Page 19 - 24, Table 3 – MITIGATION MEASURES - Add additional mitigation measures to the table to protect nesting turtles (see Sierra Club and FWS comments), and reduce impacts on visitor use and experience, and during reclamation activities (monitoring revegetation efforts).	FWS – P. 2, para. 5; FWS - P. 3, para. 8; FWS – P. 3, para. 3&4	Linda / Lisa (I would be happy to do this)
Pages 25 and 26 – add more details about why these alternatives were dismissed. Specifically, what are the adverse or beneficial impacts of the proposals?		park
Tables 4 and 5 – update as necessary		park
AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES		
Page 31 – Change title to <u>Affected Environment</u> and Environmental Consequences		park
Pages 31 – 46 Make sure and describe direct, indirect, and cumulative impacts throughout this section.	SC – P. 4 para. 7; FWS - P. 2, para. 3; FWS - P.5, para. 5	park
Pages 31 – 46 - Throughout this section, make sure and discuss the cumulative impacts on all resources from oil and gas development in the park (refer to the RFD scenario developed in the Oil and Gas Mgmt. Plan). Impact assessment should include the impacts of production ops as well.	SC – P. 1, para. 3	park
Pages 31 – 46 – It would be advisable to add impact threshold definitions for each of the impact topics to this EA. Unfortunately, there probably is not enough time to write and review these for this effort.		Park with Linda and Lisa
Page 32 – update the oil and gas info to include the Dunn Murdock well.		park

Page 35 – IMPACTS ON WATER RESOURCES AND FLOODPLAINS – Discuss whether the operation would affect the hydrology of the dunes or beach	FWS - P. 4, para. 9	park
Page 38 – IMPACTS ON WETLANDS - confirm that the impact intensity is correct. FWS questioned whether it would be a minor adverse impact since it would take >1 year to revegetate the pipeline corridor.	FWS – P. 3, para. 8	park
Page 40 – IMPACTS ON VEGETATION – discuss revegetation and required monitoring		park
Page 44 - IMPACTS ON T&E SPECIES – after Wildlife section add affected environment and environmental consequences section of the document. Include a list of federally and state listed T&E species. Include info on types of turtles, nesting times and locations, impacts of trucks, noise, lighting, people (see list of impacts itemized by Sierra Club and FWS). If possible describe the approximate location of nests vs. where BNP trucks are driving and describe any past known impacts on turtles from oil and gas operations (and other activities). Prepare table that lists all of the truck traffic, when it would occur, and the duration of the impact (use Dunn Murdock logs for this and extrapolate the truck traffic to demobilize and move the rig and do reclamation.	SC - P. 2, last para; SC - P. 3, para. 1; SC - P. 3, para. 2 (items a-e - impacts); SC – P. 4, para. 6; FWS - P. 2, para. 1; FWS – P. 4, para. 2	park
Consider the impacts on all T&E species that could occur along the entire access route and wellpad (i.e. plovers?)		park
Page 44 – IMPACTS ON VISITOR USE AND EXPERIENCE – add info on VU&E that pertains to the high season. Make sure and cover a long period of time (summer and fall months preferably). Include impacts on visitors from vehicles, noise, sounds, viewsheds etc. Are there any surveys or comments received from visitors that can be used in the EA?	SC – P. 1, para. 2; SC - P. 6, para. 2-9; SC – P. 7, para.1;	park
CONSULTATION AND COORDINATION		
Page 46 - Add Donna Shaver as a consultant, add other turtle experts that you have consulted with	SC – P. 5, para. 2; FWS – P. 5, para. 13	park
Page 46 - Add info on consultation with FWS, including info on BA, attach BA to EA for public review (?)	SC – P. 5, para. 6	park
STATEMENT OF FINDINGS - WETLANDS		
Clarify that compensation for projects under .1 acre is up to the discretion of the NPS and that the NPS wetlands expert has determined that it would not be required for this project.	FWS – P. 8, para. 2	Park with assistance from Joel Wagner
STATEMENT OF FINDINGS - FLOODPLAINS		

Describe why the drilling operations does not have to be elevated.	FWS – P. 8, para. 5	Park with assistance from Gary Smillie
--	---------------------	---