



United States Department of the Interior

NATIONAL PARK SERVICE

Padre Island National Seashore
P.O. Box 181300
20301 Park Road 22
Corpus Christi, Texas 78418

IN REPLY REFER TO:

May 03, 2002

Memorandum

To: Donna Shaver-Miller, Ph.D., Leader, USGS PAIS Field Research Station

From: Ken McMullen, Chief, Science and Resources Management, PAIS

Subject: Review of BNP and contractor training program, PAIS

Donna: Thank you for your comments on the training we put together for the BNP staff and the subcontracted drivers used to transport equipment down to the drill site. As I understand your comments, it appears that the training sufficiently covered what would be expected of the drivers and observers to help to identify a sea turtle and the nesting activity they are expected to avoid during their runs on the beach.

In putting the training together there were a couple of major points we wanted to stress. The first point is having a single point of contact for the drilling program, and that is Arlene. Since there are many more issues other than potential driving impacts to the sea turtle, we want to keep Arlene as the main point of contact. You are on the top of the list to call relative to sea turtle issues.

The notification process was set up to accommodate BNP and to ensure compliance with the many mitigation requirements associated with the permit to drill. It was decided early on, in conversations with BNP staff, what the best method of communication between drivers, the rig site, and BNP dispatch would be. This procedure has proven effective to date for both strandings and documented nesting activity, and drilling related questions. So, I am hoping we can keep it with Arlene.

All other sea turtle sightings or nesting reports have not been changed and remain with you as the first point of contact.

Another point of our training was to ensure that BNP and subcontractor folks knew what to do if a sea turtle was encountered. Darrell and Arlene spent about one and one-half (1½) hours going over the information that you commented on. Your ideas on showing the "red-eared slider" turtle, and showing a dead or "stranded" sea turtle are good and will be incorporated into future training of BNP (or other contracted) staff.

We mostly stressed the reporting of sea turtle sightings, not approaching or hindering (and especially no touching) of sea turtles themselves, protection of any sea turtle tracks, and our proposed methods to protect the sea turtle and any nests (marking with traffic cones if they cannot stay until a USGS or NPS person arrives). We also stressed safety of workers and public, which lead to the reduced speed requirement and limitations on number of truck trips per day. To date, things have worked very well and BNP has had some success at spotting sea turtles, both live and stranded. Its good that we have not impacted any sea turtles or other endangered or threatened species, or the general public so far. We continue to hope and do our best to prevent any "taking" of a sea turtle or nest, or major impact on the visitor.

The last major point of our training was to provide "search image" information and to stress the importance of covering the entire beach. Although you suggested we use a narrower search area we feel it is important to cover from the "wet zone" to the fore dunes. To date, two sea turtles were spotted emerging from the water, so a wider search area is warranted I feel. We will continue to stress a broader sweep of the beach versus confining the search to just either side of the path or traffic lane, as it also is good for the safety of the visitor.

We also stressed the ease of which a sea turtle could blend in when on the beach, or be hidden by marine debris items, sargassum, wind blown sand, etc. Again, to date we are doing well and will continue stressing these and other concerns related to the sea turtles and other endangered species that could be affected by the traffic. If only we could address the public's use of the beach in such a manner!

Thank you again for responding so quickly. BNP is well aware of our efforts to protect the species and gather scientific information and have been very supportive and enthusiastic to comply. We hope to continue this working relationship and improve on it where possible.

Ken

cc: Pat Clements
Mary Orms
Darrell Echols



Ken McMullen

05/03/02 04:16 PM

To: Mary_Orms@fws.gov, Pat_Clements@fws.gov
cc: Darrell Echols/PAIS/NPS@NPS, Jock Whitworth/PAIS/NPS@NPS
Subject: Re: BNP Training and your review

Mary: Thank you for the written message on Lemon/Lemon Seed PO, we will look forward to hearing from you.

I am enclosing my summary and response to Donna's review of the training provided to BNP. I would also like some feedback from your office on the training presented as I think it is important to include your agency's thoughts for future training of contractors. To clarify, Donna's role in training patrol staff and volunteers is not affected by this action.

We have requested that BNP keep Arlene Wimer as primary contact for oil and gas operations and compliance issues. BNP staff will call Donna and Arlene, then park dispatch, in that order, for sea turtle issues only.



Draft Donna's Notes.d

If you have any other questions or comments, please feel free to call me at 949-8173/227. Thank you for your assistance in this matter. Ken

Mary_Orms@fws.gov



Mary_Orms@fws.gov

05/02/02 04:46 PM
EST

To: ken_mcmullen@nps.gov
cc:
Subject: Lemon/Lemon Seed Comments

Ken,

In a letter from the National Park Service dated April 4, 2002 the FWS Ecological Services Field Office was requested to provide comments on the Lemon/Lemon Seed Unit Wells No. 1-1000S and No. 1-1008S within Padre Island National Seashore. Enclosed was a copy of the Plan of Operation, Environmental Assessment, Statement of Findings for Floodplains and Wetlands and an informal Section 7 Biological Assessment Form. Comments are due 30 days from the date of receipt. Our office received the documents on April 8, 2002 and are attempting to provide comments by the May 8th date.

However, as I stated in my phone message earlier today 5/2/02 at 3:15 p.m. there is a possibility that we may not be able to finalize our comments by that date and are notifying the Park that we are requesting an extension of time to ensure a thorough review is performed. We hope to provide our comments no later than May 13th.

We thank you for the opportunity to provide comments and apologize for the delay. If you have any questions please feel free to contact me at 994-9005 or by e-mail.

Mary Orms