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MDT

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Subject: Suggested revisions to the Lemon / Lemonseed EA

I've attached an updated version of the "suggested revisions to the Lemon/Lemonseed EA" table. The table now includes the Sierra Club, FWS, and NPCA comments. Let me know if you would like someone other than the person annotated on the table to do a particular task. We are more than happy to do anything to help you make this the best EA ever written!

Lisa Norby



Lemon EA revisions.do

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SUGGESTED REVISIONS TO THE LEMON / LEMONSEED EA

(Draft 5/22/02 – Norby and Dansby)

REVISION NEEDED	COMMENTOR	PERSON RESPONSIBLE
COVER LETTER		
Revise the cover letter and describe that the April 2002 EA has been revised and released for public review. The revision was necessary due to substantive comments received on the EA from Sierra Club, FWS and NPCA (and others?) Revisions focus primarily on further describing the preferred alternative, alternatives dismissed from further analysis, and the existing conditions and impacts on T&E species and visitor use and experience. Revisions to the April 2002 document are shown in a different font in the EA.	NPS internal comment	Linda
PURPOSE AND NEED		
Page 1 – Add to the purpose of the EA to say that the purpose is to provide a decision-making framework... <u>and to determine whether an EIS should be prepared.</u>	FWS – P. 2, para. 3	Park
Page 2 - Insert map showing an outline of the analysis area	FWS - P. 3 para. 7	Darrell
Page 2 – Add additional text describing impairment. Refer to the 2001 Management Policies for suggested text.	SC - P. 7, para. 4-6; FWS - P. 2, para. 3	Linda / Ken
Pages 8 & 9 – Revise issue statements for T&E species, Visitor Use and Experience, and possibly Wetlands.	NPS internal comment	Linda / Lisa
Page 9 – Remove T&E Species from topics dismissed from further analysis 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 BA, park's files, FWS, and in consultation with Donna Shaver and BRMD)	FWS & SC See additional comments below under Environmental Consequences Section)	Park
ALTERNATIVES		
Pages 10 to 19 – Under the description of the preferred alternative, clarify NPS' monitoring and enforcement of the operation (e.g., liability, what happens if BNP does not comply with their approved permit). Describe that the operator is responsible for clean-up of spills, and that a Spill Control Plan is required by the NPS and is included in the Plan of Operations. Discuss that the operator must comply with the conditions of approval specified in the plan of operations and FONSI.	FWS – P. 5, para. 7 & 8; SC – P. 8, para. 2; SC – P. 4, para. 6	Ed Kassman

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Page 17 – Clarify the term “high pressure kick” and provide a layperson’s description of the gas kick tolerances.	SC – P. 7, para. 7; FWS – P. 5, para. 2; NPCA – P. 5, para. 5 and P. 6, para. 1	Pat O’Dell
Page 18 – In the description of the preferred alternative, add information on moving the rig when the well is completed.	NPS internal comment	Park
Describe the protocol for monitoring for turtles and grading the beach. Explain where the excavated sand from the road through the pass will be stored.	SC – P. 8, para. 1 (road through dune); FWS – P. 4, para. 5	Park
Page 19 – NEW ALTERNATIVES – Add information on the following additional alternatives: -timing alternative – do not allow drilling 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 Note: These alternatives may be dismissed from further analysis. If so, describe them on page 25 of the EA.	SC – P. 4, para. 9 (hire turtle expert); SC – P. 5, para. 3; NPCA – P. 2, para. 4&6 (timing alt.)	Park with assistance from Linda and Lisa
Pages 25 & 26 - Add more details 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 protect nesting turtles (see Sierra Club and FWS comments), to reduce impacts on visitor use and experience, and during reclamation activities (e.g., monitoring and revegetation).	FWS – P. 2, para. 5; FWS - P. 3, para. 8; FWS – P. 3, para. 3&4	Linda / Lisa
Tables 4 and 5 – update as necessary	NPS internal comment	Park
AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES		
Page 31 – Change title to <u>Affected Environment</u> and Environmental Consequences	NPS internal comment	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;	Park

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	FWS - P.5, para. 5	
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 and the impact analysis prepared in the O&GMP). Impact assessment should include the impacts of BNP's proposed drilling program, the existing production operations, and the RFD scenario in the O&GMP.	SC – P. 1, para. 3 NPCA – P. 1, para. 3	Park
Pages 31 – 46 – Add impact threshold definitions for major impacts from the O&GMP. Include thresholds for all of the topics analyzed in the EA.	NPS internal comment	Park - Ken
Page 32 – Update the oil and gas numbers to include the Dunn Murdock well.	NPS internal comment	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 with assistance from WRD
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 44 - IMPACTS ON T&E SPECIES – After the Wildlife section add affected environment and environmental consequences section for T&E species. Include a list of federally and state listed T&E species. Consider the direct and indirect impacts on all T&E species that could occur along the entire access route and wellpad. Include info on species of turtles, nesting times and locations, impacts from 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 anticipated 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 to do	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; NPCA – P. 4, para. 3 and 4, P. 6, para. 2 (inadequate impact analysis); NPCA – P. 2, para. 6 and 7 (general impacts of truck trips);	Park

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reclamation). Note: Use the information developed for the BA and summarize in the EA. The NPCA and Sierra Club suggested that the NPS should initiate formal consultation under the ESA with the FWS.	NPCA – P. 3, para. 3 (impacts from trucks hauling water); NPCA – P. 4, para. 4 (impacts from trucks hauling mud and well cuttings)	
Page 44 – IMPACTS ON VISITOR USE AND EXPERIENCE – Add info on VU&E that pertains to the high season. Make sure and cover the period of time when the well is likely to be drilled (summer and fall months). 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; NPCA – P. 4, para. 5 and P. 5, para. 1, 2, and 3; NPCA – P. 5, para. 4 (impacts from venting gas – noise and visual impacts); NPCA –	Park – Ken
VU&E continued – Describe whether there would impacts on visitor use and experience from the venting of gas during drilling (blow down). Describe possible noise and visual impacts.		Pat O'Dell
CONSULTATION AND COORDINATION		
Page 46 - Add Donna Shaver as a consultant, add other turtle experts that you have consulted with. Also include info on consulting with BMRD, WRD etc.	SC – P. 5, para. 2; FWS – P. 5, para. 13	Park
Page 46 - Add info on consultation with FWS, including info on BA (e.g., T&E species surveys, informal consultation, determination of effect, concurrence date).	SC – P. 5, para. 6	Park

NPS DOCUMENT # 564

STATEMENT OF FINDINGS - WETLANDS		
Clarify that compensation for projects under .1 acre is appropriate 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 operation does not have to be elevated above the base flood level.	FWS – P. 8, para. 5	Park with assistance from Gary Smillie