

0019273

**From:** [Michael B Edwards](#)  
**To:** [Melissa Behrent](#)  
**Subject:** Fw: More protocol exchanges--Mike,heelllllp  
**Date:** 02/06/2008 08:23 AM

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----- Forwarded by Michael B Edwards/DENVER/NPS on 02/06/2008 08:23 AM -----

**Michael Mayer/DENVER/  
NPS**

To Sarah Bransom/DENVER/NPS@NPS

cc Michael B Edwards/DENVER/NPS@NPS, Sandra  
Hamilton/DENVER/NPS@NPS

08/11/2005 11:45 AM

Subject Re: More protocol exchanges--Mike,heelllllp

Sarah,

The way I am reading this is that FWS wants USGS to do an effects analysis on the protocols, which could be used in the BA. They also asked that USGS develop other "protocol alternatives" that (my thought) may provide the Park some flexibility in choosing a preferred alternative. Based on what USGS said in response to the request, it doesn't appear that there would be much "alternative protocol" analysis. So, I think for the NEPA portion, the range of alternatives for the interim action still needs to be determined. Remember that the BA will only include T&E species (plovers, turtles, and amaranth), so non-listed colonial/migratory birds would not be included in the BA. In sum, I guess, not all of the protocols would be in the BA (though the effects from other protocols on listed species would need to be assessed) and therefore the EA alternatives would still need to be determined during internal scoping--USGS and FWS are not technically developing NEPA alternatives.

Wow that was long-winded. Call me if you want me to drone on some more.

-Mike

Michael S. Mayer  
Environmental Protection Specialist  
National Park Service - Environmental Quality Division

Denver, Colorado  
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▼ Sarah Bransom

**Sarah Bransom**

To: Michael Mayer/DENVER/NPS@NPS  
cc: Michael B Edwards/DENVER/NPS@NPS, Sandra  
Hamilton/DENVER/NPS@NPS  
08/11/2005 09:49 AM MDT  
Subject: Re: More protocol exchanges--Mike,heelllllp

Sarah Bransom  
Conservation Planning and Environmental Impact Analysis  
Environmental Quality Division  
Natural Resources Program Center  
303 987-6926

Mike,

Please see the string of emails below. It sounds as if the FWS is asking the USGS to look at alternatives and the effects of those alternatives in the protocol, or in the BA, or both? These would also be the EA alternatives, I assume?

▼ Sherri Fields

**Sherri Fields**

To: Sarah Bransom/DENVER/NPS, Michael B Edwards/  
DENVER/NPS, Sandra Hamilton/DENVER/NPS  
cc:  
08/10/2005 04:55 PM EDT  
Subject: More protocol exchanges

As indicated, FYI only

Sherri L. Fields, Chief  
Science & Natural Resources Division  
Southeast Regional Office  
National Park Service  
(404) 562-3113, ext 517

-----Forwarded by Sherri Fields/Atlanta/NPS on 08/10/2005 04:54PM -----

To: Sherri Fields/Atlanta/NPS@NPS  
From: Steve Harrison/CAHA/NPS  
Date: 08/09/2005 12:54PM  
cc: Cherry Green/Atlanta/NPS@NPS  
Subject: More protocol exchanges

----- Forwarded by Steve Harrison/CAHA/NPS on 08/09/2005 12:53 PM -----

**David\_Rabon@fws.gov**

To: R Michael Erwin <rme5g@cms.  
mail.virginia.edu>  
cc: JMarion@vt.edu, jmeyers@smokey.  
forestry.uga.edu, jocohen1@vt.edu,  
John\_B\_French@usgs.gov,  
Pete\_Benjamin@fws.gov,  
Steve\_Harrison@nps.gov  
Subject: Re: Review check?

08/09/2005 12:01 PM AST

Thanks, Mike. With regard to alternatives, I fully understand the problems there. I know that most recommendations for protecting species are already at a minimum level, leaving no room to lessen the protective measures without incurring substantial adverse effects. I think taking the approach you mentioned would be good. In fact, I don't think putting numbers down would be necessary if the effects from whatever activity that is not restricted in the alternative is well documented. At least the likelihood of the effects resulting from choosing a specific alternative would be documented, even if the resultant exact decline in numbers, for example 100 pairs to 10 pairs, cannot be stated. Please let me know if I can help.

Best,  
David

David R. Rabon, Jr.  
U.S. Fish and Wildlife Service

0019276

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R Michael Erwin  
<rme5g@cms.mail.virginia.edu>  
David\_Rabon@fws.gov  
08/09/2005 11:17 AM  
Pete\_Benjamin@fws.gov,  
Steve\_Harrison@nps.gov,  
John\_B\_French@usgs.gov,  
jmeyers@smokey.forestry.uga.edu,  
JMarion@vt.edu, jocohen1@vt.edu  
Please respond to R Michael Erwin  
<rme5g@cms.mail.virginia.edu>  
To  
cc  
Subject  
Re: Review check?

Hi David - Many thanks for your comments on the draft protocol. We will put our collective heads together on your request to make the protocols more useful from a Biological Assessment perspective.

On the alternative recommendations, my reaction is that much of this would have to be guesswork, given the degree to which these species move among sites from year to year. What we could say is that, with less restriction, chances of INCREASING nesting numbers (or wintering) is highly unlikely, but putting numbers down would be pretty spurious. Anyway, we appreciate your taking a good deal of time on

these protocols.

Cheers,  
Mike Erwin

--On Tuesday, August 09, 2005 10:38 AM -0400  
David\_Rabon@fws.gov wrote:

- > Mike:
- >
- > I did a quick review of the Mig Bird Protocols, and I
- > think they look good. My only comments are (1) PIPI
- > breeding is not indicated by an oval circle on the map on
- > page 23, and (2) you may need additional clarification
- > throughout the document on why you recommend monitoring
- > from an ORV when you also state that these areas should
- > be restricted from ORV access. I see the user groups
- > reading this as it is okay for the NPS folks to use ORVs,
- > but not okay for them. I think they will fail to see
- > that it is a few number of vehicles used during
- > monitoring on an infrequent basis compared to hundreds or
- > thousands by users at all other times.
- >
- > I wanted to clarify a few comments on making the
- > protocols suitable for use as a biological assessment.
- > First, I think it is extremely important that the
- > collective protocols summarize and evaluate the existing
- > environment and the effects existing park management
- > strategies and the protocols' recommended actions will
- > have on all listed species. In short, a complete effects
- > determination is needed. The effects as well as the
- > recommended measures should be supported by reference.
- > You have done a good job with this with the Mig Bird
- > section, although it is not as important with Mig Birds
- > because the park is not required to consult on these
- > species. However, an effects determination on all species
- > will help the park justify any action they take to
- > protect the species.
- >
- > Second, I think it is equally important for the protocols
- > to layout the best, most protective measures for each
- > species, as well as alternative actions that might

> provide less protection but are more realistic in their  
> implementation. All alternatives should be fully  
> evaluated in terms of their effects on the species so the  
> park can see how doing one alternative over another will  
> affect the species. The ARM approach becomes especially  
> important when considering the alternatives. This also  
> allows the park to decide what actions to take in  
> balancing species protection and recreational use,  
> predator management, or general overall park management,  
> and alleviates USGS trying to write a plan that seeks a  
> balance or compromise between species protection and  
> recreational usage. I feel that if the protocols do any  
> less than this, they will not be acceptable as a  
> biological assessment (which the park desperately needs  
> when consulting with the Fish and Wildlife Service) and  
> will be less useful as a management tool because  
> implementation of such a document would require a more  
> formal process and possible rule-making (which the park  
> has already started in developing an ORV management plan).

>

> I greatly appreciate the time and effort that you and  
> others have spent on developing these protocols. This is  
> no easy task. I look forward to continuing to work with  
> you in the development of these protocols. I will get  
> additional comments out on the other sections in the near  
> future.

>

> Best,  
> David

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> David R. Rabon, Jr.  
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> telephone: 919.856.4520 x 16  
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>

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>  
> R Michael Erwin  
> <rme5g@cms.mail.v  
> irginia.edu>  
> To  
> David\_Rabon@fws.gov  
> 08/05/2005 11:11  
> cc AM  
>  
> Subject Re:  
> Review check? Please  
> respond to  
> R Michael Erwin  
> <rme5g@cms.mail.v  
> irginia.edu>  
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> thanks Dave...I know you have a lot to review these days!  
> I appreciate your comments. I know that what we are  
> producing may not meet all the requirements of a  
> Biological Assessment, but we hope to make these  
> protocols as useful as possible.  
>  
> Cheers  
> Mike  
>  
> --On Wednesday, August 03, 2005 7:09 AM -0400  
> David\_Rabon@fws.gov wrote:  
>  
>> Mike:  
>>  
>> It will be next week before I can get comments back to  
>> you. I will be out of the office the rest of the week  
>> this week and have another deadline I am trying to meet.  
>> I should be able to get them to you Monday or Tuesday of

>> next week, though. Is that okay?  
>>  
>> Best,  
>> David  
>>  
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>> R Michael Erwin  
>> <rme5g@cms.mail.v  
>> irginia.edu>  
>> To  
>> David\_Rabon@fws.gov,  
>> 08/02/2005 04:22 allend@coastalnet.com  
>> PM  
>> cc  
>>  
>> Subject Please respond to Review  
>> check? R Michael  
>> Erwin  
>> <rme5g@cms.mail.v  
>> irginia.edu>  
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>> Hi men - just a gentle reminder about the Aug. 5th  
>> deadline requested for the colonial waterbird



>> draft...hope it is not too heavy a burden.  
>> I got Paul Buckley's comments back already....  
>> Thanks and stay cool  
>> Mike  
>>  
>> R. Michael Erwin  
>> USGS Patuxent Wildlife Research Center  
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