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02/02/2009 03:22 PM EST

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Subject Comments on ORV Rough DEIS, Chptrs 1-3

I reviewed document and am sending hard copy markup via fedex late in week. Am also having rest of RM staff review and will forward their markups at same time if they do not prepare electronically.

Following are my general comments:

- Basically, the document looks pretty good overall. I looked at for "inconsistencies" between verbiage in different sections and really didn't find any (which is not to say they don't exist). Looks like a pretty fair editing job to this point.
- I agree with Mike's comments earlier by e-mail regarding "missing sections" and where they should go.
- Many of my comments in the hard copy I'm sending are either minor editorials or ask questions that may need to be clarified in discussion and aren't necessarily changes.
- I did not really look closely at the Chapter 3 bird and turtle stuff; I've asking Britta and her biologists to take the lead on that. I've asked Doug Stover to verify and comment on any "cultural" issues and statements, and Meghan C. to look at it from an overall "NEPA practitioner" viewpoint.
- With respect to Chapter 1, we definitely need to make a decision on coverage of soundscapes. I note that some other items that could have been covered under other impact headings, e.g., nightscapes/biological affects on turtles, were relegated to incorporation into species and/or visitor use and experience impact topics. The question is whether soundscapes can also be handled that way. I'd like other's thoughts on this.
- I still feel that the 3 current action alternatives are rather vague and it's difficult for the reader to draw an easy conclusion of the differences. Maybe it's just me. I have no recommendations for fixing.
- Alternative E, p. 15, lines 14-16, indicates that this alternative will require the greater number of park staff and resources than the other alternatives. After spending the last month in reg-neg meetings and negotiations, I'm concerned that whatever comes out of the reg-neg group may actually require the most resources. If this happens, modifications to the draft and the description of at least Alt. E will need to change (potentially including the title).
- Does the write-up for Alt. B need to change if changes to the Consent Decree are negotiated in the next few months?
- Couldn't figure out why there was no permit fee for Alt. D other than to make it different. It will still require significant resources. Perhaps I missed something in the discussion on this.
- I thought that the use of "out of scope" statements could be greater in the section on alternative elements considered but dismissed from further consideration. It's used in a couple of elements, but not in others where it's obvious to me that it's pertinent. An example is the use of dredge spoil islands for bird production. This is particularly pertinent when discussing the mandate to protect ecosystems, not just individual critters. This "ecosystem protection" argument (p. 21, line 32 et. seq.) is effective and could potentially be used to address a number of the elements dismissed. In any case, I still maintain this is an ORV Plan, not a resource plan, and that a lot of the issues that are out of scope for this as well as other reasons.
- With respect to Ch.3, I question the "balance" of info./write-up on the different species. Lots of info. on PIPLs, much less on some of the other species. This is a judgement call, but it did stand out to me. Also, the subheadings/subsections under each species need to be verified for consistency.
- Cumulative impacts - I know this is extremely hard to get a handle on. I make some comments on markup. One general question; do infrastructure items such as interdunal roads, parking lots, beach access ramps, etc. that will come out of the EIS need to be noted in the future actions column for other impact topics such as wetlands/floodplains and soundscapes? Since this is noted on other impact topics, I would think it would be germane for these also.

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