

From: [Mansfield, Carol A.](#)  
To: [Mike Murray@nps.gov](#); [Doug Wetmore@nps.gov](#)  
Cc: [Mansfield, Carol A.](#)  
Subject: RE: interim strategy and BCA  
Date: 10/26/2011 01:24 PM

Hi Mike and Doug,  
It looks like I put the wrong dates in for the Interim Strategy, so we should revise the BCA to have the right dates. Section 2.3.3, first paragraph should also be revised as it refers to each no action alternative being in place for 1 year. There may be other places as well. I apologize for that, we must have been looking at the year the FONSI was signed.

The change doesn't have any impact on the analysis or the rest of the document. We did not try to forecast visitation, because we didn't have confidence in our ability to determine the number of visitors to the beach under either the action or no-action alternatives (partly because we didn't have many years of management to look at, as the paragraph states, and also because of the difficulty in identifying just the number of people on the beach not including the lighthouse visitors, etc, but including locals).

Let me know if there are other issues,  
Carol

-----Original Message-----  
From: Mike Murray@nps.gov [mailto:Mike\_Murray@nps.gov]  
Sent: Wednesday, October 26, 2011 3:07 PM  
To: Doug\_Wetmore@nps.gov  
Cc: Mansfield, Carol A.  
Subject: Re: interim strategy and BCA

Doug,

I defer to Carol about whether the edit would affect the wording about the ripple effect in the BCA. I'm under the impression, but not sure, that the BCA considered economic impacts or visitation data from 2006. In any case, the reality is that the park operated under the Interim Strategy in 2006 (and again in 2007), even though the FONSI wasn't signed until July 2007.

It wasn't clear to me where Bruce got the dates he used, which indicated the Interim Strategy was in effect from 2007 until April 30, 2008. AS he worded it, the statement is factually incorrect. Also, it is unclear if he used that time span for any particular reason. If he based the dates on when the FONSI was signed or the time period that was considered in preparing the economic analysis (if that, in fact, did not include 2006), then perhaps the statement could be reworded along the lines of: "Although the NPS began implementation of the Interim Strategy in 2006, the document was not considered "final" until issuance of the FONSI in July 2007. As a result, the ["economic analysis" or "BCA", whatever term is most correct] only considered the impacts of the Interim Strategy during its implementation between 2007 and April 30, 2008."

Mike Murray  
Superintendent  
Cape Hatteras NS/ Wright Brothers NMem/ Ft. Raleigh NHS  
(w) 252-473-2111, ext. 148  
(c) 252-216-5520  
fax 252-473-2595

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Doug  
Wetmore/DENVER/NP  
S  
10/26/2011 02:26  
PM  
Mike Murray/CAHA/NPS@NPS  
carolm@rti.org  
interim strategy and BCA  
To  
cc  
Subject

Mike.

I noticed that you made a change to Bruce's responses to comments on the rule. The text that you revised is straight from the Benefit-Cost Analysis. Should it be changed there and will there be a ripple effect throughout the BCA?

2.3 Visitation Data  
Many different factors cause visitation to vary across years, so a single year may not provide a reliable estimate of average future visitation. Because each no-action alternative has been in place for a limited amount

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of time, we do not have a long history with which to estimate average visitation. ORV use in the Seashore was managed under Alternative A, the Interim Strategy, in 2007 (CHANGED TO "2006 and 2007") and the beginning of 2008 (THIS PHRASE DELETED), and under the Consent Decree since April 30, 2008. As a result, we use data from other sources to assess visitation under the no-action alternatives.

Doug Wetmore  
National Park Service  
Natural Resource Stewardship & Science  
Environmental Quality Division  
P.O. Box 25287  
Denver, CO 80225-0287  
303.987.6955 (office)  
303.968.5214 (cell)