

19 May 2000

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Dear Christina:

As a technical reviewer of and pilot project participant in DOT/OPS's modeling for ecological unusually sensitive areas (USAs) along existing pipeline rights-of-way, I would like to offer some comments. Let me first state that I was impressed with the level of detail at which the overall task was completed. It was obvious that much thought was given this project, and you and your staff and contractors are to be commended for your efforts. My comments follow:

1. In the April Rule published by DOT/OPS, Filter Criterion #1 is described to include only "viable occurrences" of G1-ranked species and subspecies. How were the Heritage data sets filtered to determine EO viability? I'm concerned that this statement in the Rule may effectively negate a significant portion of the results from the most current analyses of the model because EOs don't necessarily reflect viable populations. Will a USA be dropped from the portfolio of sites if the data used do not reflect "viable occurrences" of a species?
2. The flow chart distributed at the April 27, 2000 workshop (in the bound booklet) is confusing as to how pre-qualification criteria were addressed in the model.
3. The use of 3 species as a minimum number in Filter Criterion #2 seems arbitrary, and, for the Louisiana data set, is inadequate for protecting such species as Piping Plover and some freshwater mussels, which are not captured in Filter Criterion #1. For Louisiana data, the use of 3 species instead of 2 fails to capture 2/3 of the federally listed species and about 1/3 of the G1 species in Louisiana. Although the G1 species are captured in Filter Criterion #1, I strongly recommend using a minimum of 2 species when modeling multi-species protection areas (Filter Criterion #2). Pipeline ruptures in areas with these species have a high probability of creating irreversible damage to these at-risk species.
4. The model presented in the 27-28 April workshop, could be significantly improved by using 1) G1 and G2 natural community EORs and 2) rookery EORs from the

Heritage BCD. Although not all states have completed crosswalking the state natural community classification to the national standard, by utilizing the existing data in only the 3 states of Louisiana, Texas, and California (which contain 46% of the U.S. liquid pipelines), DOT/OPS would substantially improve the methodology for identifying USAs in areas where pipelines are located. In order to filter this criterion, I suggest using the EORANK field, which inherently identifies the most significant extant sites. EORANK could also aid in ranking all wading and seabird nesting colonies among all states, thereby identifying critical ecological areas. Rookery data is extremely valuable as it indicates what is often an assemblage of multiple species during what is their most vulnerable time, nesting. The distribution of pipelines and rookeries coincides in the southern Louisiana coastal zone. I see the omission of G1 and G2 community data and all wading bird and seabird data as a major gap in the methodology of developing USAs. The need to use these data can't be overemphasized.

5. I am unclear as to the habitat types assigned to each EOR. Without seeing a list of which habitats were assigned to each species, I can't comment directly on this process except to say that I would find that process to be somewhat subjective at times, depending on the species and depending on what the EO definition was. I'm curious how Piping Plover was assigned a habitat type, whether it was open water or isolated water, and how that, in turn, affected the USA map.
6. How were state ranks used in the model? I thought that SX and SH ranks were used to filter EORs, yet Red Wolf records were plotted on the USA maps for Louisiana. I'm unclear as to why these records were not filtered out of the final analysis.
7. Regarding the GRANK field, how were discrepancies between state Heritage and TNC resolved? Often, the expert is at the Heritage office, and TNC's ranking records may not be current. The need to review such discrepancies with the Heritage office cannot be over-emphasized.
8. Regarding publishing USAs on your web site, I need to review the Data Utilization Agreement we signed to determine if there may be restrictions on that. I have been out of the office much of the time since my return to Baton Rouge from the Washington meeting, I will continue to be out of the office for another 3 weeks. I plan to review the agreement upon my return to the office. I'll contact you afterwards.

Christina, thanks for the opportunity to participate in the pilot project, and for the opportunity to provide these comments in review of the model. I will ask my secretary to send you these comments in writing on LDWF stationery. Meanwhile, I'll send them to you via email to expedite your getting them.