United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Post Office Box 649
Albuquerque, New Mexico 87103

IN REPLY REFER TO:

October 23, 2003

William Connor, Ph.D.
Chief, Damage Assessment Center
U.S. Department of Commerce
National Oceanic and Atmospheric Administration
National Ocean Service
Office of Response and Restoration
1305 East-West Highway
N/ORCA x1 SSMC4
Silver Spring, MD 20910

Dear Dr. Connor:

In response to the notice dated September 17, 2003, soliciting comments on the Louisiana Regional Restoration Planning Program (LRRPP) Draft Region 2 Restoration Plan, the following are comments provided by the U.S. Department of the Interior. It is my understanding that the U.S. Fish and Wildlife Service has also provided comments.

SPECIFIC COMMENTS

Page 22, first full paragraph under "Cash Settlement." This information on Discounted Service Acre Years (DSAYs) has no context. Why is $28,464 correct? Does the revised Programmatic Environmental Impact Statement (PEIS) have a full reference for this cost and the Habitat Equivalency Analysis in Appendix D? If not, it needs a reference for a defensible settlement.

Appendix A. Does the revised PEIS provide life history data (e.g., longevity, birth rate, years of breeding, start year of breeding, amount of habitat necessary for breeding) for these species? If not, development of inputs for Resource Equivalency Analyses would aid in facilitating quicker settlements.

Page D-11, Appendix D-1. Does the revised PEIS provide more information on implementation? Staff implementing the LRRPP may start inappropriately averaging and dividing costs by acres for other projects. It may be useful to have more details on some of the limitations and special circumstances that make some projects more expensive than others. We recommend additional interpretation to make this information more useful.

Page D-19, Appendix D-4. A discount factor should be shown. Does the revised PEIS have full instruction on how to do Habitat Equivalency Analysis? If not, some may need to be added.

Page D-20, Appendix D-20. Why is this relative productivity true? Are there any references related to this in the PEIS?

Thank you for the opportunity to provide comments on the Draft Region 2 Restoration Plan. If you have questions or need additional information, feel free to contact me at (505) 766-3565.

Sincerely,

Stephen R. Spencer, Ph.D.
Acting Regional Environmental Officer

cc: Director/Deputy Director, DOI/OEPC, Washington, DC
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