

# Deepwater Horizon MC252

## Shoreline Treatment Recommendation Operational Permit to Work

Local Name: Pensacola Beach M STR #: FL-4-005

Survey Date: 04-Apr-2011

Segment Name	Start LAT	Start LONG	End LAT	End LONG	Length (m)
FLES2 - 012	30.32443	-87.1807	30.32608	-87.17069	948
FLES2 - 013	30.32608	-87.17069	30.32715	-87.16021	978
FLES2 - 014	30.32715	-87.16021	30.32855	-87.1514	833
FLES2 - 015	30.32855	-87.1514	30.32935	-87.14799	328
FLES2 - 016	30.32935	-87.14799	30.33086	-87.13865	880
FLES2 - 017	30.33086	-87.13865	30.3323	-87.1305	771
FLES2 - 018	30.3323	-87.1305	30.33571	-87.1113	1816
FLES2 - 019	30.33571	-87.1113	30.33829	-87.09792	1271
FLES2 - 020	30.33829	-87.09792	30.33934	-87.0929	480
FLES2 - 021	30.33934	-87.0929	30.34061	-87.0857	681
FLES2 - 022	30.34061	-87.0857	30.34244	-87.07706	825
FLES2 - 023	30.34244	-87.07706	30.34404	-87.06882	783
FLES2 - 024	30.34404	-87.06882	30.34564	-87.06131	718
FLES2 - 025	30.34564	-87.06131	30.34695	-87.05345	742

**Total Length: 12054 meters**

**Location:** Pensacola Beach Amenity Maintenance - Escambia County, FL  
Formally covered under FL-3-002

**Shoreline Type:** The shorelines in the STR are characterized by fine grained sand beach (ESI-3) with dunes in the backshore.

**Treatment Type:** ☒ Surface ☐ Subsurface ☐ Submerged ☒ Manual ☒ Mechanical

### Oiled Area For Treatment:

This STR-4 also includes the western portion of FLES3-001, that is not on University of West Florida property. Surface oil in intertidal and supratidal zones. (See Figure 1)

### Cleanup Recommendation:

The following locations of residual oil have been identified as requiring maintenance in the segments addressed by this STR (see Figure 1).

Zone A – Trace amounts of SRBs, typically 0.5-2 cm in diameter, in the swash zone, LITZ, MITZ and UITZ.

Zone B – Trace amounts of SRBs, typically 0.5-2 cm in diameter, in the non-vegetated Supratidal Zone.

#### Cleanup Recommendation:

This STR addresses the cleanup of residual surface oiling only. No subsurface oil removal is approved under this STR.

1) The cleanup criteria defined for segments under this STR is based on the MC 252 2011 SCAT Plan for Alabama/Florida/Mississippi. The NFT standard for amenity beaches is no visible oil above background levels, or as low as reasonably practical considering the allowed treatment methods and net environmental benefit (above background levels).

2) Residual surface oiling may be addressed by manual cleanup crews using hand tools such as rakes, sifters, etc. Mechanical equipment, such as Sand Sharks, Beach Techs, etc., may be utilized for surface

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oil removal under this STR if agreed by Planning, Operations, Environmental and Stakeholders. The size and configuration of the Operation Patrol Teams will be determined through consultation of SCAT, Planning and Operations. Please utilize the attached 'Mechanical Option Concurrence' form to implement any mechanical techniques under this STR.

3) Should subsurface oil be located, SCAT shall be immediately notified via the SCAT Ops Liaison. SCAT will then conduct a survey of the area and develop a site-specific STR to address the newly observed subsurface oil.

4) Beach wrack shall NOT be removed unless heavily oiled and only after consultation with an NRA/READ.

5) A 10-foot buffer zone from the TOE of the dune system seaward must be observed. Any specially authorized work will require a qualified NRA (READ or similar). Egress through dune systems will be marked, flagged and approved in advance of their use.

6) All ATV, UTV or other mechanical equipment operate at no more than 5-6 mph or SLOWER safe speed.

#### Cleanup Frequency:

Initially, the Operations Patrol Teams will traverse each segment in this STR a minimum of once per day. The Operations Patrol Teams will document the amount of oil collected, in pounds, per segment. This data will be provided to the Situation Unit in the Branch. SCAT, Planning, and Operations will review the recovery data, by segment, to evaluate trends. SCAT, Planning, and Operations will determine if the recovery rates trends indicate that a change in patrol frequency or scale of activity is necessary or recommended. SCAT and Planning, in consultation with Operations, can recommend frequency changes under this STR upon prior consultation with stakeholders. If an agreement with the stakeholder over a change in frequency cannot be reached, then the issue will be referred to the Unified Command.

In addition to the scheduled surveys, a survey by the Operations Patrol Teams can also be initiated after a storm event. For the purpose of this STR, a storm event is defined as any weather pattern which results in winds / waves that could be expected to result in the re-exposure of residual oil.

#### Operational Reporting Requirements:

Each Operations Patrol Team will document, for each day of activity:

- 1) Number of workers on a crew,
- 2) The date,
- 3) The length of segment treated, and
- 4) The amount of oil collected (lbs) on a PER SEGMENT basis.

One report will be prepared for EACH SEGMENT worked. This data will be provided DAILY to the Situation Unit in the Branch.

(Note: Complete a report for each segment patrolled even if no oil was collected)

Within Zone B, in addition to the manual Operations Patrol Teams, a non-material collecting mechanical beach rake (or suitable alternative) could be utilized after the area has been treated. The operation of the beach rake is intended to aid in the natural biodegradation of small (<1cm) SRBs in the SUTZ that, due to their size, are difficult to be removed manually. Recommend initial raking frequency is daily. Frequency and time of day for use of equipment needs to be coordinated with land managers.

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**Staging and Logistics:**

Cleanup operations will be staged from pre-approved locations.

**Ecological Concerns:**

All Florida STRs and Field Plans require NRA and/or READ staffing for implementation to ensure compliance with trust resource laws and regulations. As specified in the BMPs, Section 7 in consultation with Section 106 will provide recommendations regarding the appropriate number/type of NRAs/READs required based on geography, needs of trust resources, safety and methodologies used by Operations.

A 10 foot buffer zone from the toe of the dune for the protection of the dune and habitat of the Beach Mouse must be observed. The buffer should be marked by flagging, which will be and removed when work is complete. SRB's observed within vegetated areas in the SUTZ and the buffer zone should be manually removed with supervision by an NRA/READ.

Please see attached Best Management Practices (BMPs) for avoiding and minimizing impacts to wildlife, including but not limited to shorebirds, raptors, sea turtles, beach mice, piping plovers, and other protected or managed species. BMPs applicable to this area are checked for easy reference.

**Cultural / Historical Concerns:**

Please read and follow the instructions provided by the Section 106 Team included in this STR.

In the event that unanticipated archaeological sites, historic or prehistoric artifacts, graves, human remains or other cultural resources are discovered in the project area, all work must cease. The on-site Operations supervisor must be notified, who must contact the Section 106 Team.

Work shall not resume until the Operations supervisor has been advised by the Section 106 Team. Contact the Section 106 Team at: section106@bpgom.com and call the Section 106 Team Leader or SCAT Lead Archaeologist.

**Safety Concerns:**

Appropriate Job Hazard Analyses will be followed for all cleanup activities.

**Comments:**

None

**Attachments:**   ☐ Segment Map   ☒ Sketch   ☐ SCAT Form   ☐ FactSheet   Other: \_\_\_\_\_

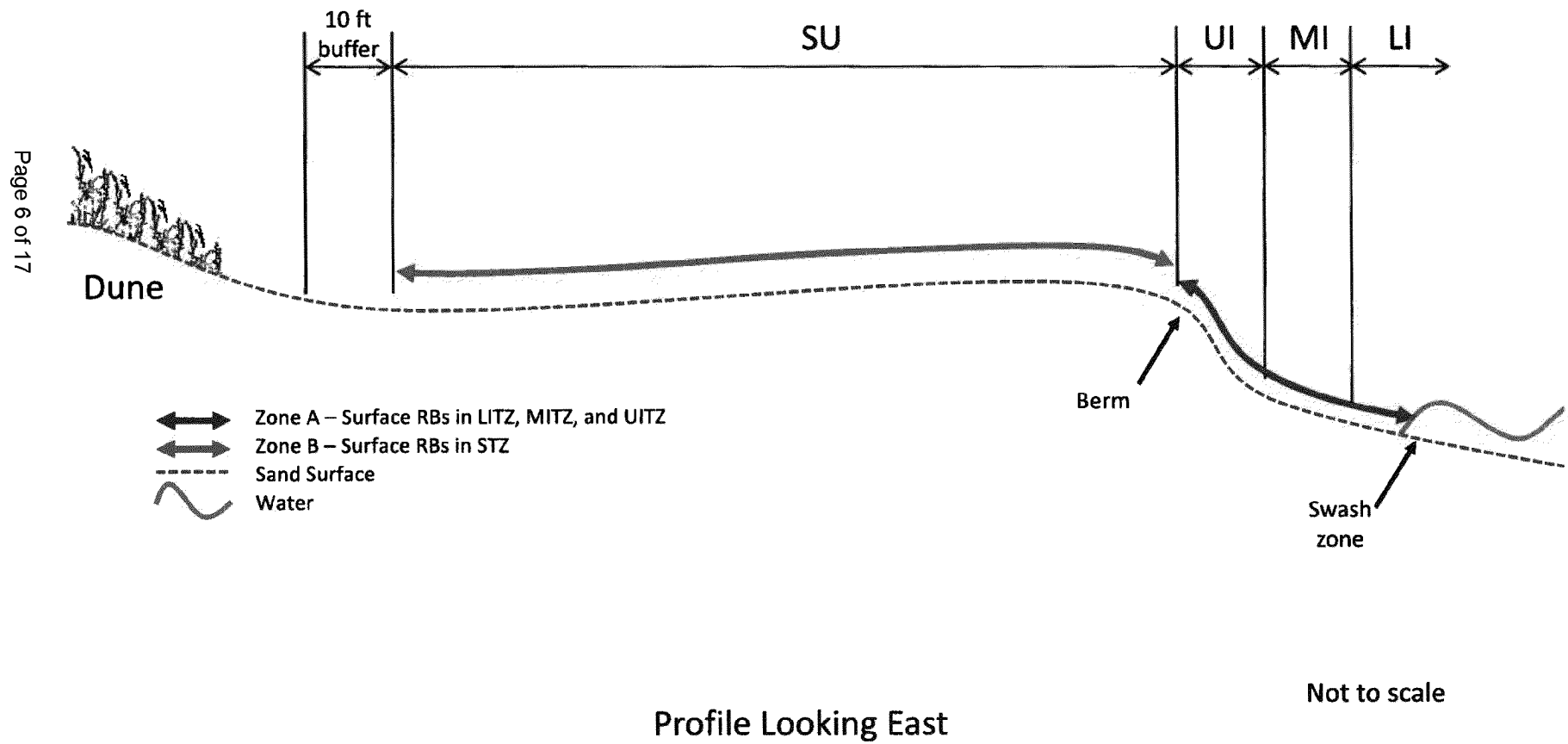
**Deepwater Horizon MC252**  
**Shoreline Treatment Recommendation      Operational Permit to Work**  
**Local Name: Pensacola Beach M STR #: FL-4-005      Survey Date: 04-Apr-2011**

<b>Prepared By:</b> <u>Milnes, Andrew</u>		<b>Date Prepared:</b> <u>27-Mar-2011</u>			
<b>Date:</b>	<u>4-27-11</u>	<u>26 APR 11</u>	<u>4-15-11</u>		
<b>Print Name:</b>	<u>Gracie Kennedy</u>	<u>Tom Shuman</u>	<u>Wing D. G. G.</u>		
<b>Sign/Initial:</b>	<u>GRK</u>	<u>Tom Shuman</u>	<u>Wing D. G. G.</u>		
	State Rep	Section 7	Section 105	NOAA	Other
<b>Final Approval: Print</b> <u>Gracie Kennedy</u>					
<b>Sign</b> <u>Gracie Kennedy</u> <u>FOSC</u> <u>BP EUL</u>					
<b>** When Treatment is Completed, send a Segment Completion Report to SCAT **</b>					

**Deepwater Horizon MC252**  
**Shoreline Treatment Recommendation      Operational Permit to Work**  
**Local Name: Pensacola Beach M    STR #: FL-4-005      Survey Date: 04-Apr-2011**

<b>Prepared By:</b> <u>Milnes, Andrew</u>		<b>Date Prepared:</b> <u>27-Mar-2011</u>		
<b>Date:</b>	<div style="border: 1px solid black; padding: 2px; text-align: center;">26 APR 11</div>	<div style="border: 1px solid black; padding: 2px; text-align: center;">4-28-11</div>	<div style="border: 1px solid black; padding: 2px; text-align: center;">4/28/11</div>	<div style="border: 1px solid black; padding: 2px; text-align: center;"></div>
<b>Print Name:</b>	<div style="border: 1px solid black; padding: 2px; text-align: center;">Tom Shuman</div>	<div style="border: 1px solid black; padding: 2px; text-align: center;">Long Bay</div>	<div style="border: 1px solid black; padding: 2px; text-align: center;">Frank W. Clark</div>	<div style="border: 1px solid black; padding: 2px; text-align: center;"></div>
<b>Sign/Initial:</b>	<div style="border: 1px solid black; padding: 2px; text-align: center;">Tom Shuman</div>	<div style="border: 1px solid black; padding: 2px; text-align: center;">Long Bay</div>	<div style="border: 1px solid black; padding: 2px; text-align: center;">Frank W. Clark</div>	<div style="border: 1px solid black; padding: 2px; text-align: center;"></div>
	<small>State Rep</small>	<small>Section 7</small>	<small>Section 103</small>	<small>NOAA</small>
<b>Final Approval: Print</b>	<u>See Attached</u>	<u>William Carter</u>	<u>JOHN NEPYWODA</u>	
<b>Sign</b>	<u>BOBC</u>	<u>WLC</u> <small>FOBC 4/28/11</small>	<u>John Nepyвода</u> <small>EPUL 4/27/11 1355</small>	
<b>** When Treatment is Completed, send a Segment Completion Report to SCAT **</b>				

Figure 1  
Typical Maintenance STR-4  
Cleanup Zones



**Mechanical Option Concurrence** under Stage 4- STR: \_\_\_\_\_

Date/Hour: \_\_\_\_\_ Submitted by: \_\_\_\_\_

**Concurrence Requested (OPS, SCAT):**

☐ Use of mechanical treatment using the following equipment: \_\_\_\_\_

☐ Other:

**Oiling Conditions Requiring Treatment:**

e.g.,

L \_\_\_\_\_ yd W \_\_\_\_\_ yd \_\_\_\_\_ % Distribution \_\_\_\_\_ Oil Type \_\_\_\_\_ Mean size, inches

Coordinates (if applicable):

Other description/explanation of need for variance:

Map Attached: Y / N      Photographs Attached: Y / N

**Environmental Coordinator Consultation:**

Contact	Name	Time	Comment
Major Landowner/ Land Mgr			
State			
USFWS			
Other			

Date/Hour: \_\_\_\_\_ Submitted by: \_\_\_\_\_

☐ Not approved

☐ Approved, with following constraints:

# SECTION 7 FEDERAL AGENCY ACTION - ENDANGERED SPECIES ACT

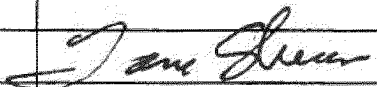
## MC 252 DWH Sec 7 Authorized Best Management Practices

for Alabama, Florida and Mississippi

### Applicable BMP Checklist for Individual Shoreline Treatment Recommendations

DATE: 14APR2011 Branch/Division: \_\_\_\_\_ STR #: FL-4-005

Segment #'s: FLES2-012 to 025, and FLES3-001 (not on UWF Property)

Role	Print Name	Signature	Date	Concur (Y/N)
USFWS	Tom Shearer		14APR11	Y
NMFS				

1) In Daily 214s and on checklist, NRAs/READs should report: Notable migratory bird and threatened/endangered species activity in operational areas. Any logistical issues that interfere with implementation of specific BMPs. Instances of re-oiling in areas of completed shoreline treatments (Please advise if SCAT is required).

2) NOTE: These BMPs are developed as recommendations to avoid or minimize impacts to natural resources, including those protected by the Endangered Species Act of 1973. If these BMPs cannot be adhered to during oil removal operations an explanation or justification and/or any Corrective Action taken must be documented in the space provide at the end of this checklist. Please contact local or GCIMT Sec 7 Rep for clarification/guidance.

Applicable Y or N/A	Corrective Action (x)	BMP #	BMP DESCRIPTION
Y		BMP 1	[MODIFIED] Watch for and avoid collisions with wildlife. Report all turtle sightings and all distressed or dead birds, sharks, rays, and marine mammals to the appropriate state hotline: <b>**See page 4 for phone #s</b>
Y		BMP 3	[MODIFIED] Avoid any vegetation, marsh soils, or peat with foot traffic/boats/equipment <b>by 10 feet</b> or contact the <b>Section 7 Coordinator/Liaison</b> to minimize impact. <b>Use existing travel corridors.</b>
Y		BMP 5	Maintain compliance with the Decontamination Plan where applicable.
Y		BMP 6	[MODIFIED] Cleanup operations during daylight hours are recommended. <b>If nighttime operations are necessary: (1) confine operations to landward side of the intertidal zone; and, (2) Year Round, follow ENV0009: Minimizing Impacts to Wildlife during Nighttime Cleanup Operations. Avoid night-time activities in identified exclusion areas to allow longer periods without disturbance to wildlife and to minimize vehicle damage within optimal habitat.</b>
Y		BMP 7	[MODIFIED] From 1 May through 31 October*, observe a 10 foot buffer from marked sea turtle nests. If a nest area is contaminated/oiled, contact appropriate State for further instructions: <b>**See page 4 for phone #s</b>
Y		BMP 8	[MODIFIED] Utilize existing access/egress areas and roadways. <b>UTVs should remain within the established travel path when possible, to minimize beach topographic alterations.</b>
Y		BMP 9	[MODIFIED] From 1 May through 31 October*, verify sea turtle nesting activities with agency experts and begin onshore cleanup operations during daylight hours after nesting surveys/conservation activities are completed. <b>If nighttime cleanup operations will be conducted, Wildlife Observers must be present.</b>

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Y		BMP 10	[MODIFIED] Use low-pressure tire (10 psi) vehicles (e.g. ATVs, Gators) or contact a qualified biologist to minimize impact.
Y		BMP 11	[MODIFIED] Year round, if feasible and per appropriate guidance, restore beach topography, if altered, to natural beach profile by 2000 hours each day.
Y		BMP 12	Minimize removal of clean sediments and organic matter.
N/A		BMP 13	[MODIFIED] Avoid hovering or landing aircraft near posted bird sites and dunes.
N/A		BMP 16	[MODIFIED] Install, monitor, or remove under water equipment/booms to prevent fish/wildlife entrapment.
N/A		BMP 17	Do not block major egress points in channels, rivers, passes, and bays.
N/A		BMP 22	No flights below 500 feet over wildlife refuges, management areas, bird rookeries, or National Parks.
N/A		BMP 24	Turtle excluder devices (TEDs) should be installed on all trawl nets.
Y		BMP 25	[MODIFIED] Staging areas and waste collection areas should be examined prior to set up and should be located to avoid beaches, dunes, inlets or ephemeral tidal pools, scrub, and other vegetated areas. Contact the Section 7 Coordinator/Liaison if assistance is needed.
Y		BMP 26	[MODIFIED] Avoid the wrack line (dead organic matter- seaweed, grasses, driftwood) while conducting cleanup activities and traveling to and from locations. If the wrack line must be crossed by equipment or vehicles, a READ, NRA, or biologist may rake the wrack out of the way to establish a travel corridor for crossing.
Y		BMP 27	Activities that may require removal of forested and shrub or scrub habitat should be minimized.
Y		BMP 28	Remove all trash or anything that would attract wildlife to work areas on a daily basis.
Y		BMP 29	If a sea turtle is spotted, maintain at least 200 feet between the turtle and any beach clean-up activities.
Y		BMP 30	Stakes or flagging should not be removed or destroyed anywhere on the beach.
Y		BMP 32	[MODIFIED] Avoid posted/marked or other known bird nesting areas and rookeries and minimize activities in critical habitat areas for Endangered Species. All land and water crafts, when operated near these areas shall be controlled to minimize noise and speed. Air Boats shall not be used unless all other reasonable means have been tried and then pre-approval must be obtained from the Trustee/Landowner(s). If it is determined that an Air Boat is the only viable means of transportation, then a distance of 1000 feet should be maintained from critical habitats, marshes, wetlands, rookeries, and/or other high bird use areas.
Y		BMP 33	[MODIFIED] READs, NRAs, WOs, or biologists should accompany all cleanup crews (both daytime and nighttime operations) in appropriate numbers to ensure BMPs are implemented properly. Contact the section 7 Coordinator/Liaison for recommendations on appropriate numbers.
Y		BMP 34	[MODIFIED] NRAs or READs should check work corridor ahead of working equipment for evidence of sea turtles, shorebirds, and beach mice. If conducting nighttime operations, initial surveys should be done on foot, but UTVs/ATVs may be used if needed, to adequately check in front of working equipment after the corridor has been cleared.
Y		BMP 35	Sea turtle crawls should not be impacted until nest sites have been appropriately documented.

Y		BMP 36	<b>[MODIFIED] If nighttime operations are required, Year Round shielded headlamps must be used, in addition, appropriate red filters must be used 1 May through 31 October*</b>
Y		BMP 37	<b>[MODIFIED] During Night Ops, work areas should be maintained within 10 feet of previously identified oiled areas.</b>
Y		BMP 38	<b>Equipment operated at appropriate speeds (&lt; 5mph).</b>
Y		BMP 39	<b>[MODIFIED] Avoid the dunes, both vegetated and non-vegetated. Establish a buffer zone, with flagging if necessary, from the toe of the slope of the dune to a distance of 10 feet. Where vegetation extends off the dune onto the beach, the buffer should extend 10 feet from the vegetation. Mechanical activity (equipment, UTV, etc.) should not occur in the buffer or on the dune. Contact the Sec 7 Coordinator/Liaison for sand guppies use.</b>
N/A		BMP 40	<b>[NEW] All vessels shall operate at "no wake/idle" speed at all times while in water where the draft of the vessel provides less than a four-foot clearance from the bottom. All vessels shall follow deep-water routes whenever possible.</b>
N/A		BMP 41	<b>[NEW] Land or stage boats to avoid crushing the vegetation.</b>
N/A		BMP 42	<b>[NEW] To reduce the possibility of bottlenose dolphin entanglement in the lazyline, use a stiffer line such as a crab lay.</b>
N/A		BMP 43	<b>[NEW] Avoid scouring and prop-scarring submerged aquatic vegetation (e.g., seagrass).</b>
Y		BMP 44	<b>[NEW] Minimize disturbance to bayside flats by reducing the amount of cleanup comparable to the amount of tarball accumulation. For example, areas with minimal tarballs might only require a cleanup once every two weeks versus daily.</b>
N/A		BMP 45	<b>[NEW] For net recovery of tar balls, a maximum allowable tow time of 30 minutes. After 30 minutes, check the net for any live or dead sea turtles.</b>
Y		BMP 46	<b>[NEW] If sporadic tarballs are seen in the dune buffer zone or on the dune, they may be removed by a single person or by a crew of up to three individuals using small hand tools, working from the buffer zone. Avoid walking, standing, sitting, or other human intrusion on the dunes. If more than sporadic oil residues are noted in the dunes, contact the Section 7 Coordinator/Liaison.</b>
Y		BMP 47	<b>[NEW] The operational area should be surveyed by an NRA or READ for the presence of piping plovers or optimal habitat features and documented on the BMP checklist and 214. Optimal habitat includes inlets, bayside mud flats, tidal pools and wrack lines. When piping plovers are identified, vehicle and foot traffic should not occur within 150 feet from the birds, or 10 feet from optimal habitat features when escorted by a NRA or READ. If day or night travel through exclusion zones is necessary, vehicles should follow existing/established travel lanes and maintain slow speeds.</b>
Y		BMP 48	<b>[NEW] If a Bald eagle nest is discovered, all activities should avoid the nest by 660 feet unless the nest is protected by a vegetated buffer, then the avoidance distance is 330 feet. If a Bald eagle nest is discovered, the "National Bald Eagle Management Guidelines" should be followed in order to not disturb the eagles during any nesting, feeding or roosting activities. These guidelines are available at: <a href="http://www.fws.gov/migratorybirds/baldeagle.htm">http://www.fws.gov/migratorybirds/baldeagle.htm</a></b>
Y		BMP 49	<b>[NEW] Surveys for migratory bird nests should be implemented beginning in February in Florida and April for all other areas. When nesting areas are discovered, these areas and historically used areas should be roped to prevent cleanup activities from encroaching into nesting areas and rookeries. Cleanup in the roped area should be avoided.</b>
Y		BMP 50	<b>[NEW] Avoid removing the wrack line. Manually remove tarballs from the primary wrack line. If wrack is covering subsurface oil that must be cleaned, the wrack can be manually raked out of the way and then put back once the oil is removed.</b>
Y		BMP 51	<b>[NEW] Follow the "Avoidance of Nesting Birds and Piping Plovers During Shoreline Cleanup on Beaches" to protect piping plovers and their critical habitat.</b>

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			* All seasonal restrictions listed above may be adjusted by the section 7 Coordinator/Liaison based upon the likelihood of species presence.
			** For Manatees in FL call: 1-888-404-3922; in AL, LA & MS call: 1-904-731-3079. For Dolphins & Whales in all Gulf States call: 1-877-942-5343; For Sea Turtles call #: LA: 1-225-765-2377 or 1-337-962-7092; AL: 1-866-732-8878; FL: 8am-8pm 1-800-241-4653 (ID# 274-4867), 8pm - 8am 1-888-404-3922; MS: 1-888-767-3657. For birds, call appropriate #: LA: 1-225-954-9883 or 1-225-698-3168; AL: 1-251-442-7419; FL: 1-888-404-3922; MS: 1-228-452-9453 (Near Pass Christian) or 1-228-669-2737 (Near Biloxi, MS). Only after trying above #'s, then try 1-866-557-1401

**Comments / Corrective Actions:**

Seasonal adjustment regarding sea turtles: BMP Numbers 7 & 9 should be implemented prior to May 1 if sea turtle nesting activity begins prior to that date. BMP Numbers 29 and 35 should be implemented if a sea turtle or sea turtle tracks are seen.

In Daily 214s (Unit Logs) and on checklist, NRAs/READs should report: Notable migratory bird and threatened/endangered species activity in operational areas; any logistical issues that interfere with implementation of specific BMPs; and instances of re-oiling in areas of completed shoreline treatments. Please advise if SCAT is required.

If you have questions regarding implementation of BMPs, contact your Branch Section 7 Liaison or Resources at Risk (RAR) Coordinator. If they are unavailable, contact NOLA Sec7 Liaison at 404-345-8998 or FW4DWHSec7Liaison@fws.gov

**Reporting Instructions:** Before Operations conducted, NRAs & READs must Review all Applicable BMP's for the specific STR Indicated by Sec 7 on this form; During and/or After Ops conducted, Fill out BMP Implementation Checklist and document any divergence from the BMP's that occurred.

NRAs/READs E-mail Completed BMP Implementation Checklist to: [GCIMTDocumentation@bp.com](mailto:GCIMTDocumentation@bp.com) ;

[FW4DisasterDocumentation@fws.gov](mailto:FW4DisasterDocumentation@fws.gov) ; [FW4recordsmobile@fws.gov](mailto:FW4recordsmobile@fws.gov) ; [FW4Section7OilSpill@fws.gov](mailto:FW4Section7OilSpill@fws.gov) ;

[NMFS.ser.mobile.reports@noaa.gov](mailto:NMFS.ser.mobile.reports@noaa.gov)

and

E-mail Daily 214s(Unit Logs)to your NRA/READ Team Lead.

NRA/READ Team Leads append all team member Daily 214s to one E-mail and send to: [GCIMTDocumentation@bp.com](mailto:GCIMTDocumentation@bp.com) ;

[Ferrel.Brunet@bp.com](mailto:Ferrel.Brunet@bp.com) ; [FW4DeputyBranchDirectorHouma@fws.gov](mailto:FW4DeputyBranchDirectorHouma@fws.gov) ; [FW4DisasterDocumentation@fws.gov](mailto:FW4DisasterDocumentation@fws.gov) ;

[FW4DWHSec7Liaison@fws.gov](mailto:FW4DWHSec7Liaison@fws.gov) ; [FW4Section7OilSpill@fws.gov](mailto:FW4Section7OilSpill@fws.gov) ; [MC252\\_GCIMTSIT@bp.com](mailto:MC252_GCIMTSIT@bp.com) ; [MurgR0@bpgom.com](mailto:MurgR0@bpgom.com) ;

[NMFS.ser.mobile.reports@noaa.gov](mailto:NMFS.ser.mobile.reports@noaa.gov)

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# SECTION 7 FEDERAL AGENCY ACTION - ENDANGERED SPECIES ACT


MC 252 DWH Sec 7 Authorized Best Management Practices

for Alabama, Florida and Mississippi

## Applicable BMP Checklist for Individual Shoreline Treatment Recommendations

DATE: 04/14/11 Branch/Division: \_\_\_\_\_ STR #: FL-4-005

Segment #'s: FLES2 012-025

Role	Print Name	Signature	Date	Concur (Y/N)
USFWS				
NMFS	Kelly Shotts		4/14/11	Y

1) In Daily 214s and on checklist, NRAs/READs should report: Notable migratory bird and threatened/endangered species activity in operational areas. Any logistical issues that interfere with implementation of specific BMPs. Instances of re-oiling in areas of completed shoreline treatments (Please advise if SCAT is required).

2) NOTE: These BMPs are developed as recommendations to avoid or minimize impacts to natural resources, including those protected by the Endangered Species Act of 1973. If these BMPs cannot be adhered to during oil removal operations an explanation or justification and/or any Corrective Action taken must be documented in the space provide at the end of this checklist. Please contact local or GCIMT Sec 7 Rep for clarification/guidance.

Applicable Y or N/A	Corrective Action (x)	BMP #	BMP DESCRIPTION
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		BMP 3	[MODIFIED] Avoid any vegetation, marsh soils, or peat with foot traffic/boats/equipment <b>by 10 feet</b> or contact the <b>Section 7 Coordinator/Liaison</b> to minimize impact. <b>Use existing travel corridors.</b>
Y		BMP 5	Maintain compliance with the Decontamination Plan where applicable.
		BMP 6	[MODIFIED] Cleanup operations during daylight hours are recommended. If nighttime operations are necessary: (1) confine operations to landward side of the Intertidal zone; and, (2) Year Round, follow ENV009: Minimizing Impacts to Wildlife during Nighttime Cleanup Operations. Avoid night-time activities in identified exclusion areas to allow longer periods without disturbance to wildlife and to minimize vehicle damage within optimal habitat.
		BMP 7	[MODIFIED] From 1 May through 31 October*, observe a 10 foot buffer from marked sea turtle nests. If a nest area is contaminated/oiled, contact appropriate State for further instructions: <b>**See page 4 for phone #s</b>
		BMP 8	[MODIFIED] Utilize existing access/egress areas and roadways. <b>UTVs should remain within the established travel path when possible, to minimize beach topographic alterations.</b>
		BMP 9	[MODIFIED] From 1 May through 31 October*, verify sea turtle nesting activities with agency experts and begin onshore cleanup operations during daylight hours after nesting surveys/conservation activities are completed. <b>If nighttime cleanup operations will be conducted, Wildlife Observers must be present.</b>

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		BMP 10	[MODIFIED] Use low-pressure tire (10 psi) vehicles (e.g. ATVs, Gators) or contact a qualified biologist to minimize impact.
		BMP 11	[MODIFIED] Year round, if feasible and per appropriate guidance, restore beach topography, if altered, to natural beach profile by 2000 hours each day.
Y		BMP 12	Minimize removal of clean sediments and organic matter.
		BMP 13	[MODIFIED] Avoid hovering or landing aircraft near posted bird sites and dunes.
Y		BMP 16	[MODIFIED] Install, monitor, or remove under water equipment/booms to prevent fish/wildlife entrapment.
Y		BMP 17	Do not block major egress points in channels, rivers, passes, and bays.
		BMP 22	No flights below 500 feet over wildlife refuges, management areas, bird rookeries, or National Parks.
		BMP 24	Turtle excluder devices (TEDs) should be installed on all trawl nets.
Y		BMP 25	[MODIFIED] Staging areas and waste collection areas should be examined prior to set up and should be located to avoid beaches, dunes, inlets or ephemeral tidal pools, scrub, and other vegetated areas. Contact the Section 7 Coordinator/Liaison if assistance is needed.
		BMP 26	[MODIFIED] Avoid the wrack line (dead organic matter- seaweed, grasses, driftwood) while conducting cleanup activities and traveling to and from locations. If the wrack line must be crossed by equipment or vehicles, a READ, NRA, or biologist may rake the wrack out of the way to establish a travel corridor for crossing.
		BMP 27	Activities that may require removal of forested and shrub or scrub habitat should be minimized.
		BMP 28	Remove all trash or anything that would attract wildlife to work areas on a daily basis.
Y		BMP 29	If a sea turtle is spotted, maintain at least 200 feet between the turtle and any beach clean-up activities.
		BMP 30	Stakes or flagging should not be removed or destroyed anywhere on the beach.
		BMP 32	[MODIFIED] Avoid posted/marked or other known bird nesting areas and rookeries and minimize activities in critical habitat areas for Endangered Species. All land and water crafts, when operated near these areas shall be controlled to minimize noise and speed. Air Boats shall not be used unless all other reasonable means have been tried and then pre-approval must be obtained from the Trustee/Landowner(s). If it is determined that an Air Boat is the only viable means of transportation, then a distance of 1000 feet <u>should be</u> maintained from critical habitats, marshes, wetlands, rookeries, and/or other high bird use areas.
		BMP 33	[MODIFIED] READs, NRAs, WOs, or biologists should accompany all cleanup crews (both daytime and nighttime operations) in appropriate numbers to ensure BMPs are implemented properly. Contact the section 7 Coordinator/Liaison for recommendations on appropriate numbers.
		BMP 34	[MODIFIED] NRAs or READs should check work corridor ahead of working equipment for evidence of sea turtles, shorebirds, and beach mice. If conducting nighttime operations, initial surveys should be done on foot, but UTVs/ATVs may be used if needed, to adequately check in front of working equipment after the corridor has been cleared.
		BMP 35	Sea turtle crawls should not be impacted until nest sites have been appropriately documented.

		BMP 36	<b>[MODIFIED] If nighttime operations are required, Year Round shielded headlights must be used, in addition, appropriate red filters must be used 1 May through 31 October*</b>
		BMP 37	[MODIFIED] During Night Ops, work areas should be maintained within 10 feet of previously identified oiled areas.
		BMP 38	Equipment operated at appropriate speeds (< 5mph).
		BMP 39	<b>[MODIFIED] Avoid the dunes, both vegetated and non-vegetated. Establish a buffer zone, with flagging if necessary, from the toe of the slope of the dune to a distance of 10 feet. Where vegetation extends off the dune onto the beach, the buffer should extend 10 feet from the vegetation. Mechanical activity (equipment, UTV, etc.) should not occur in the buffer or on the dune. Contact the Sec 7 Coordinator/Liaison for sand guppies use.</b>
Y		BMP 40	[NEW] All vessels shall operate at "no wake/idle" speed at all times while in water where the draft of the vessel provides less than a four-foot clearance from the bottom. All vessels shall follow deep-water routes whenever possible.
		BMP 41	[NEW] Land or stage boats to avoid crushing the vegetation.
		BMP 42	[NEW] To reduce the possibility of bottlenose dolphin entanglement in the lazyline, use a stiffer line such as a crab lay.
		BMP 43	[NEW] Avoid scouring and prop-scarring submerged aquatic vegetation (e.g., seagrass).
		BMP 44	[NEW] Minimize disturbance to bayside flats by reducing the amount of cleanup comparable to the amount of tarball accumulation. For example, areas with minimal tarballs might only require a cleanup once every two weeks versus daily.
		BMP 45	[NEW] For net recovery of tar balls, a maximum allowable tow time of 30 minutes. After 30 minutes, check the net for any live or dead sea turtles.
		BMP 46	[NEW] If sporadic tarballs are seen in the dune buffer zone or on the dune, they may be removed by a single person or by a crew of up to three individuals using small hand tools, working from the buffer zone. Avoid walking, standing, sitting, or other human intrusion on the dunes. If more than sporadic oil residues are noted in the dunes, contact the Section 7 Coordinator/Liaison.
		BMP 47	[NEW] The operational area should be surveyed by an NRA or READ for the presence of piping plovers or optimal habitat features and documented on the BMP checklist and 214. Optimal habitat includes inlets, bayside mud flats, tidal pools and wrack lines. When piping plovers are identified, vehicle and foot traffic should not occur within 150 feet from the birds, or 10 feet from optimal habitat features when escorted by a NRA or READ. If day or night travel through exclusion zones is necessary, vehicles should follow existing/established travel lanes and maintain slow speeds.
		BMP 48	[NEW] If a Bald eagle nest is discovered, all activities should avoid the nest by 660 feet unless the nest is protected by a vegetated buffer, then the avoidance distance is 330 feet. If a Bald eagle nest is discovered, the "National Bald Eagle Management Guidelines" should be followed in order to not disturb the eagles during any nesting, feeding or roosting activities. These guidelines are available at: <a href="http://www.fws.gov/migratorybirds/baldeagle.htm">http://www.fws.gov/migratorybirds/baldeagle.htm</a>
		BMP 49	[NEW] Surveys for migratory bird nests should be implemented beginning in February in Florida and April for all other areas. When nesting areas are discovered, these areas and historically used areas should be roped to prevent cleanup activities from encroaching into nesting areas and rookeries. Cleanup in the roped area should be avoided.
		BMP 50	[NEW] Avoid removing the wrack line. Manually remove tarballs from the primary wrack line. If wrack is covering subsurface oil that must be cleaned, the wrack can be manually raked out of the way and then put back once the oil is removed.
		BMP 51	[NEW] Follow the "Avoidance of Nesting Birds and Piping Plovers During Shoreline Cleanup on Beaches" to protect piping plovers and their critical habitat.

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			* All seasonal restrictions listed above may be adjusted by the section 7 Coordinator/Liaison based upon the likelihood of species presence.
			** For Manatees In FL call: 1-888-404-3922; in AL, LA & MS call: 1-904-731-3079. For Dolphins & Whales in all Gulf States call: 1-877-942-5343; For Sea Turtles call #: LA: 1-225-765-2377 or 1-337-962-7092; AL: 1-866-732-8878; FL: 8am-8pm 1-800-241-4653 (ID# 274-4867), 8pm - 8am 1-888-404-3922; MS: 1-888-767-3657. For birds, call appropriate #: LA: 1-225-954-9883 or 1-225-698-3168; AL: 1-251-442-7419; FL: 1-888-404-3922; MS: 1-228-452-9453 (Near Pass Christian) or 1-228-689-2737 (Near Biloxi, MS). Only after trying above #'s, then try 1-866-557-1401

Comments / Corrective Actions:

In Daily 214s (Unit Logs) and on checklist, NRAs/READs should report: Notable migratory bird and threatened/endangered species activity in operational areas; any logistical issues that interfere with implementation of specific BMPs; and instances of re-oiling in areas of completed shoreline treatments. Please advise if SCAT is required.

If you have questions regarding implementation of BMPs, contact your Branch Section 7 Liaison or Resources at Risk (RAR) Coordinator. If they are unavailable, contact NOLA Sec7 Liaison at 404-345-8998 or FW4DWHSec7Liaison@fws.gov

Reporting Instructions: Before Operations conducted, NRAs & READs must Review all Applicable BMP's for the specific STR indicated by Sec 7 on this form; During and/or After Ops conducted, Fill out BMP Implementation Checklist and document any divergence from the BMP's that occurred.

NRAs/READs E-mail Completed BMP Implementation Checklist to: [GCIMTDocumentation@bp.com](mailto:GCIMTDocumentation@bp.com) ;

[FW4DisasterDocumentation@fws.gov](mailto:FW4DisasterDocumentation@fws.gov) ; [FW4recordsmobile@fws.gov](mailto:FW4recordsmobile@fws.gov) ; [FW4Section7OilSpill@fws.gov](mailto:FW4Section7OilSpill@fws.gov) ;

[NMF5.ser.mobile.reports@noaa.gov](mailto:NMF5.ser.mobile.reports@noaa.gov) and E-mail Daily 214s(Unit Logs)to your NRA/READ Team Lead.

NRA/READ Team Leads append all team member Daily 214s to one E-mail and send to: [GCIMTDocumentation@bp.com](mailto:GCIMTDocumentation@bp.com) ;

[Ferrel.Brunet@bp.com](mailto:Ferrel.Brunet@bp.com) ; [FW4DeputyBranchDirectorHouma@fws.gov](mailto:FW4DeputyBranchDirectorHouma@fws.gov) ; [FW4DisasterDocumentation@fws.gov](mailto:FW4DisasterDocumentation@fws.gov) ;

[FW4DWHSec7Liaison@fws.gov](mailto:FW4DWHSec7Liaison@fws.gov) ; [FW4Section7OilSpill@fws.gov](mailto:FW4Section7OilSpill@fws.gov) ; [MC252\\_GCIMTSIT@bp.com](mailto:MC252_GCIMTSIT@bp.com) ; [MurgR0@bpgom.com](mailto:MurgR0@bpgom.com) ;

[NMF5.ser.mobile.reports@noaa.gov](mailto:NMF5.ser.mobile.reports@noaa.gov)

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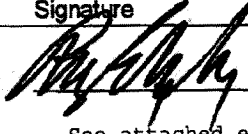
# Deepwater Horizon MC-252 Incident Section 106 Consultation Signature Sheet

STR #  
Division  
Segments

STR-FL-4-005  
FLES2  
FLES2-012 through FLES2-025

Date  
Consultation Location

4/11/2011  
AL Branch

Role	Name	Signature	Concur?
Section 106 Rep.	Larry Murphy		<input checked="" type="checkbox"/>
SHPO Rep.	Ryan Wheeler	See attached email	<input checked="" type="checkbox"/>
Tribal Rep.	Kenneth H. Carleton	Not available for comment	<input checked="" type="checkbox"/>
Invited Party			<input type="checkbox"/>

## We concur providing that the marked 106 constraints and advisory notes are followed.

CR-1	No Known Culture Concern: In the event that unanticipated archaeological sites, historic or prehistoric artifacts, graves or other cultural resources are discovered in the area of potential project effects, work in the immediate area must cease pending an evaluation by a qualified archaeologist or other qualified historic preservation personnel and consultation with the Section 106 Team.	<input checked="" type="checkbox"/>
CR-2	250 Meter Sensitivity Zone: The project is within 250 meters of a known cultural resource. A qualified archaeologist or other qualified historic preservation personnel must be present for the undertaking and will provide direction on avoiding or minimizing project impacts to the cultural resource. See comments for further information.	<input type="checkbox"/>
CR-3	Potential Cultural Concern: The project area contains a segment that requires a new or additional Historic Properties survey. The survey may be accomplished independently in advance of the undertaking, or may be accomplished immediately prior to the undertaking by a qualified archaeologist or other qualified historic preservation personnel accompanying the project team. See Comments for further information.	<input type="checkbox"/>
CR-4	Avoid Area: The project area contains a sensitive cultural resource. No activities should take place in the segment containing this resource. See Comments for further information.	<input type="checkbox"/>

### Comments

No further archaeological investigations are necessary. The plan for unanticipated discoveries noted above in CR-1 remains in effect for all operational activities.



## Justin Stickler

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**From:** Wheeler, Ryan J. <RJWheeler@dos.state.fl.us>  
**Sent:** Tuesday, April 12, 2011 8:34 AM  
**To:** Justin Stickler  
**Cc:** Larry Murphy; kcarleton@[REDACTED]; kcarleton@[REDACTED]  
**Subject:** RE: STR-FL-Stage 4

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Justin:

Thanks for sharing these STRs. I reviewed each carefully and concur with the recommendations. Thanks, Ryan

Ryan J. Wheeler, Ph.D.  
State Archaeologist and Chief,  
Bureau of Archaeological Research

B. Calvin Jones Center for Archaeology at the Governor Martin House  
1001 de Soto Park Drive, Tallahassee, FL 32301  
Phone: 850.245.6301  
FAX: 850.245.6452  
E-mail: [rjwheeler@dos.state.fl.us](mailto:rjwheeler@dos.state.fl.us)

Please take a few minutes to provide feedback on the quality of service you received from our staff. The Florida Department of State values your feedback as a customer. Kurt Browning, Florida Secretary of State, is committed to continuously assessing and improving the level and quality of services provided to you. Simply click on the link to the "DOS Customer Satisfaction Survey." Thank you in advance for your participation.  
[DOS Customer Satisfaction Survey](#)

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**From:** Justin Stickler [mailto:jstickler@[REDACTED]]  
**Sent:** Monday, April 11, 2011 2:41 PM  
**To:** kcarleton@[REDACTED]; kcarleton@[REDACTED]; Wheeler, Ryan J.  
**Cc:** Larry Murphy  
**Subject:** STR-FL-Stage 4

Ken and Ryan:

Please see attached the following Florida Stage 4 (Maintenance and Monitor) STRs:

STR-FL-4-005  
STR-FL-4-006  
STR-FL-4-007  
STR-FL-4-008

The Section 106 Team has reviewed and made recommendations concerning the proposed undertakings. We request your concurrence with the recommendations made in the 106 Consultation Page.

Let me know if you have any questions. Also, please advised (especially given how many STRs are coming at you at once) that we are trying to maintain a 48-hour turnaround for the review process of these STRs. I also, know that we all have Stakeholder meetings this week, so we'll see how it goes.

Thanks,