

---

**From:** Childs, Jeff  
**Sent:** Wednesday, June 14, 2006 4:33 PM  
**To:** Stang, Paul  
**Cc:** Cranswick, Deborah  
**Subject:** RE: invasive species reassignment

Paul,

Please clearly specify for me the DOI and MMS policy that Debbie alluded to below. Debbie cites the opinion issued by Greg Gould (below) which is erroneous and hopefully does not represent official published DOI and MMS policy. Please also clearly specify for me why invasive species are scoped out of the Sale 193 EIS as well as the LS 202 EA. As before, I request this information in written form.

Also, Debbie's email to John Goll dated Tue Mar 14 18:46:12 2006 (attached in her message) misrepresents my stated position, the information I requested for further analysis for the PEA, and is entirely devoid of the recommendations I offered to mitigate adverse impacts below significance. Please note that during our final meeting on invasive species, I requested that the information that Sue Banet provided that day on specific vessel practices of hull cleaning be included in the PEA and that I would modify my analysis accordingly. Debbie objected to including the hull cleaning information in the PEA and I then indicated that if it could not be included, then I would not be able to change my analysis.

Again, I am warning you that MMS permitted activities that involve bringing vessels, rigs, platforms, etc. to Alaska from Outside are likely to bring with them species that are not-native to Alaska, some of which may be introduced, and some of which may become invasive species without additional mitigation measures beyond those specified in the the existing U.S. Coast Guard regulations which do not prevent such introductions. The USCG specifically acknowledged such in their PEA from which the regulations were formed. The introduction on non-native species to Alaska waters that subsequently become invasive may very well yield much greater significant adverse impacts than a large oil spill.

Cheers,  
Jeff

---

**From:** Cranswick, Deborah  
**Sent:** Friday, June 16, 2006 11:52 AM  
**To:** Childs, Jeff  
**Cc:** Stang, Paul  
**Subject:** FW: invasive species reassignment

Jeff,

Below, I have provided a response to your e-mail to Paul Stang. Paul has referred your e-mail to me, as your direct supervisor, for response. Please note that in my response to your previous e-mail to Paul that I asked that you come in and talk to me if you had any further questions.

1. In response to your first paragraph: Greg Gould, John Goll, and I have all informed you - both verbally and in writing via e-mail - what MMS policy is at this time relative to invasive species: The Coast Guard has authority and regulations dealing with the invasive species issue. The MMS defers to the USCG regulations and assumes that they are appropriate and adequate\*. We require the seismic companies to follow the USCG regulations. Therefore, there is no current issue related to invasive species for MMS NEPA purposes. (\* Regional policy is that we don't tell other agencies how to do their jobs. We assume and respect their competence in the areas under their authority.)

This is MMS policy and not Greg Gould's opinion. Please consider this written notification of this policy. This policy is why invasive species is currently being scoped out of our NEPA documents.

Additional background information FYI. The MMS/DOI response to requirements of EO 13122, Section 2 included the following:

"A. Prevent the introduction of invasive species.

The MMS has no specific program authorities relevant to the prevention of introduction of invasive species. The U.S. Coast Guard is responsible for inspections of all ships, including transported semi-submersible drilling rigs, for possible transport of invasive species.

B. Detect and respond rapidly to and control populations of invasive species.

The MMS does not have specific program authorities to respond to invasive species introductions. However, MMS could provide information to appropriate agencies (e.g., NOAA) on invasive species collected through MMS-required inspections of existing pipelines and platform legs, benthic biological surveys, and other MMS-sponsored environmental studies. The MMS may establish mitigation measures for the control of invasive species in the event that the transport of such species into OCS areas can be linked to offshore oil and gas exploration and development activities."

2. In response to your second paragraph. Obviously we have different perceptions and recollection of the events you are referring to. My recollection is that I discussed asking the permittees for information on their hull cleaning and ballast water exchange with Rance Wall. Rance agreed that we could ask for the information but that MMS could not require the permittees to clean hulls or exchange ballast water if we in some way did not "like" what they reported to us. I discussed this compromise with you and I specifically recall you saying you were not going to budge. I report this verbally to Paul Stang and we agree to stay the issue until the conference call.

I do not recall you offering to change your analysis because we would ask for hull cleaning history from permit applicants.

The hull cleaning practices of the vessels that are being proposed for specific G&G permit applications were not include in the PEA for two reasons: 1. The issue of invasive species was scoped out per stated MMS policy; and 2) The PEA is a programmatic document so the information specific to individual G&G permit applications is not relevant and not appropriate to include.

3. In response to your third paragraph. You have made this point repeatedly and I assure you that both Regional management and HQ management have heard and considered your opinion and concerns. In light of the stated MMS policy, I do not believe that you need to continue to send e-mail on this.

Per 41 CFR 20.502: While policies related to one's work are under consideration employees are expected to express their professional opinions and points of view. Once a decision is rendered by those in authority, each employee is expected to comply with the decision to ensure the success of programs or issues affected by the decision.

Again, please come in and discuss this with me further if you have any additional questions.

Debbie

---