

U.S. DEPARTMENT OF THE INTERIOR

THIRD INTERIM PARTIAL CLAIM FOR ASSESSMENT AND RESTORATION PLANNING COSTS
20 APRIL 2010 *DEEPWATER HORIZON* (MC 252) INCIDENT

TIME PERIOD: JANUARY – DECEMBER 2014



Submitted By:

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Appendix A:
List of Proposed Assessment and Restoration Planning Activities

EXECUTIVE SUMMARY

On April 20, 2010, an explosion and fire on the *Deepwater Horizon* mobile offshore drilling unit resulted in 11 worker fatalities and discharges of oil and other substances from the rig and seabed wellhead into the Gulf of Mexico. Pursuant to section 1006 of the Oil Pollution Act (“OPA”), 33 U.S.C. §§ 2701 *et seq.*, and Executive Order 13626, federal, state, and federally recognized tribes are Trustees for natural resources and are authorized to act on behalf of the public to: (1) assess natural resource injuries resulting from a discharge of oil or the substantial threat of a discharge and response activities; and (2) develop and implement a plan(s) for restoration of such injured resources.

This document identifies 14 assessment and restoration planning procedures, including studies, which agencies within the U.S. Department of the Interior (“Department” or “DOP”) plan to implement in 2014 to inform natural resource damage injury determination, injury quantification, and restoration selection activities associated with the *Deepwater Horizon* Oil Spill (“Oil Spill”). This document is a supplement to the Department’s Interim, Partial Claim dated July 1, 2011, and the Second Interim Partial Claim, dated October 4, 2012, which identified Assessment procedures that may have been performed in 2011, 2012 and 2013. The collection of activities identified in this Third Interim Partial Claim (“Claim” or “Third Claim”) reflect consideration of the factors identified in 15 C.F.R. § 990.27 (use of assessment procedures), § 990.51 (injury determination) and § 990.52 (injury quantification). The assessment activities also reflect consideration of data and analyses conducted during the pre-assessment phase of the Natural Resource Damage Assessment (“NRDA”). Restoration planning activities identified reflect consideration of the factors identified in 15 C.F.R. § 990.53 (developing restoration alternatives), § 990.54 (evaluation of alternatives), and § 990.55 (developing restoration plans). The Department will also be further developing and maintaining a document management system to support the Trustees’ efforts to develop an Administrative Record. In addition, the Department will be evaluating injury assessment and restoration planning and implementation records for inclusion into the Administrative Record(s) (§ 990.61). Scientific information to support injury determination and quantification, although incomplete, is sufficient for the Trustees to proceed with restoration planning. The Department’s assessment and restoration planning activities in this Claim are a subset of the NRDA activities conducted by all Trustees. Department activities in this Claim document focus on impacted natural resources the Department directly manages – including endangered species, migratory birds, and DOI-managed lands and facilities. The Department expressly reserves its ability to supplement the assessment and restoration planning procedures identified herein.

This Third Claim covers the Department’s assessment and restoration planning activities and estimated costs for 2014 that are unique from activities already paid for by BP or the U.S. Coast Guard. The document is organized to provide a description of the Department’s proposed activities by resource category or major topic area. The Department’s Coordination, Oversight, Implementation and Analysis costs include labor costs of all the

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staff employed by the Department that are required to prepare a comprehensive injury assessment and restoration planning. The Department requests a total of \$45,893,913 to complete NRDA activities during the budgeted period. (See Exhibit 3)

Exhibit 1 provides summary cost information for estimated contractor costs for assessment and restoration planning procedures included in this Claim, including proposed field studies, laboratory and data analysis, and data management which totals \$18,636,758. Exhibit 2 provides estimated costs for coordination, oversight, implementation and analysis activities for DOI personnel in 2014. Although different labor rates and total hours were estimated for a variety of DOI personnel, the total cost is used to cover expenses for more than 50 administrative support specialists, scientists, restoration specialists, attorneys and program managers working on the NRDA. These costs total \$21,270,993. In addition, as shown in Exhibit 3, the Department also seeks \$5,986,163 in contingency funds, estimated at 15% of the sum of assessment and restoration planning costs. Contingency funds are intended to cover the risk that actual costs are higher than expected, and only will be made available upon documentation of higher than expected costs.

In total, the Department is seeking a sum certain of \$45,893,913 for injury assessment and restoration planning activities specified in this document.

Data collection and analysis is ongoing, and may result in the identification of additional NRDA activities by the Department and/or its co-Trustees or, alternatively, the decision may be made to not pursue an activity identified in this Claim. The need for any additional studies and assessment activities and their relationship to existing data collection efforts and analyses and data management will be clearly identified in any future assessment claims. This Third Claim is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

Exhibit 1 – Injury Assessment and Restoration Planning Procedures

Total	\$18,636,758
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Exhibit 2 – Costs for DOI, Coordination, Oversight, Implementation and Analysis

Total	\$21,270,993
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Exhibit 3 – Contingency Funds and Total

	IPC Cost	15% of IPC Cost (contingency)	Total IPC
NRDA Procedure Costs	\$18,636,758	\$2,795,514	\$21,432,272
DOI Coordination/ Oversight Costs	\$21,270,993	\$3,190,649	\$24,461,642
Grand Total	\$39,907,750	\$5,986,163	\$45,893,913

1. ADMINISTRATIVE INFORMATION

1.1. Claimant Eligibility and Coordination with Co-Trustees

The following governmental entities are designated natural resource Trustees under OPA and Executive Order 13626 and are currently acting as Trustees for this Incident¹:

the U.S. Department of the Interior, as represented by the National Park Service (“NPS”), the Fish and Wildlife Service (“FWS”), and Bureau of Land Management (“BLM”);

the National Oceanic and Atmospheric Administration (“NOAA”), on behalf of the United States Department of Commerce;

the Environmental Protection Agency (“EPA”)

the US Department of Agriculture (“USDA”)

the United States Department of Defense (“DOD”);

the State of Louisiana’s Coastal Protection and Restoration Authority, Oil Spill Coordinator’s Office, Department of Environmental Quality, Department of Wildlife and Fisheries and Department of Natural Resources;

the State of Mississippi’s Department of Environmental Quality;

the State of Alabama’s Department of Conservation and Natural Resources and Geological Survey of Alabama;

the State of Florida’s Department of Environmental Protection; and Florida Fish and Wildlife Conservation Commission;

the State of Texas’ Parks and Wildlife Department, General Land Office, and Commission on Environmental Quality (collectively, the “Trustees”).

In addition to acting as Trustees for this Incident under OPA, the States of Louisiana, Mississippi, Alabama, Florida and Texas are also acting pursuant to their applicable state laws and authorities, including the Louisiana Oil Spill Prevention and Response Act of 1991, La. R.S. 30:2451 *et seq.*, and accompanying regulations, La. Admin. Code 43: 101 *et seq.*; the Texas Oil Spill Prevention and Response Act, Tex. Nat. Res. Code, Chapter 40, Section

¹ In this Claim, the *Deepwater Horizon/MC252* Oil Spill is referred to as “Oil Spill” or “Incident” which may include, as applicable, all Incident(s) related to the events of the explosion, fire and subsequent discharges of oil and other substances from the rig and wellhead on the seabed into the Gulf of Mexico.

376.011 *et seq.*, Fla. Statutes, and Section 403.161, Fla. Statutes; the Mississippi Air and Water Pollution Control Law, Miss. Code Ann. §§ 49-17-1 through 19-17-43; and Alabama Code §§ 9-2-1 *et seq.*, and 9-4-1 *et seq.*

Several technical working groups (“TWGs”) exist, each comprised of Trustee representatives and led by the Trustees to guide and coordinate data collection and analysis for the NRDA. As appropriate, these TWGs coordinate with and consider input from BP Exploration and Production, Inc. on TWG activities. The procedures identified in this Claim are planned to be implemented and/or overseen by DOI personnel, were developed in coordination with the Department’s co-Trustees, and include TWG review.

Funds received by the Department previously from BP have not been applied to any of the proposed activities in this Claim. Department expenses incurred as a result of proposed assessment work in deepwater communities, described in NOAA’s Third Interim, Partial Claim for Assessment and Restoration Planning Costs (Dated July 11, 2013) are excluded from this Claim. Thus, Department expenses incurred in the following NOAA Claim categories are solely covered in NOAA’s Third Interim Partial Claim:

- Deep Sea Soft Bottom Sediments
- Deep Sea Hard Ground Corals
- Mesophotic Reefs
- Benthic Megafauna

1.2. Responsible Party Information

The Responsible Parties (“RPs”) identified for this Incident thus far are BP Exploration and Production, Inc. (“BP”); Transocean Holdings Inc. (“Transocean”); Triton Asset Leasing GmbH (“Triton”); Transocean Offshore Deepwater Drilling Inc. (“Transocean Offshore”); Transocean Deepwater Inc. (“Transocean Deepwater”); Anadarko Petroleum (“Anadarko”); Anadarko E&P Company LP (“Anadarko E&P”); and MOEX Offshore 2007 LLC (“MOEX”). Pursuant to 15 C.F.R. § 990.14(c), concurrent with the publication of the Notice to Conduct Restoration Planning, the Trustees invited the RPs identified above to participate in an NRDA. The Trustees have coordinated with BP, the only RP who accepted this invitation to actively participate in the NRDA process.

1.3. Determination of Jurisdiction

For reasons identified in the Notice of Intent to Conduct Restoration Planning for this Incident, the Trustees determined they have jurisdiction to pursue restoration under OPA. 75 Fed. Reg. 60800 (Oct. 1, 2010).

1.4. Time Limitations on Claims

This Claim for funding of reasonably necessary assessment and restoration planning procedures to inform Incident-specific injury determination and quantification analyses is

presented in writing to the Director, National Pollution Funds Center (NPFC) within time limits specified in 33 C.F.R. § 136.1010 (i.e., within three years from the date of completion of the natural resources damages assessment). The NRDA for this Incident is not complete.

1.5. Legal Action

On December 15, 2010, the United States filed its complaint against the RPs in the Eastern District of Louisiana (Civil Case no. 2:10-cv-04536). At this time, the trial schedule does not include natural resource damages quantification in the first two phases of litigation.

1.6. Claim Presentation

This Third Interim, Partial Claim for Assessment and Restoration Planning Costs has been presented for a sum certain, in accordance with OPA to all of the identified RPs by letters dated October 8, 2013.

2. ASSESSMENT: OVERVIEW OF APPROACH

OPA regulations provide that NRDA procedures be tailored to the circumstances of the incident and the information needed to determine appropriate restoration. With respect to standards for assessment procedures, the regulations provide that (15 C.F.R. § 990.27(a)):

- (1) the procedure(s) must be capable of providing assessment information of use in determining the type and scale of restoration appropriate for a particular injury;
- (2) the additional cost of a more complex procedure must be reasonably related to the expected increase in the quantity and/or quality of relevant information provided by the more complex procedure; and
- (3) the procedure must be reliable and valid for the particular incident.

OPA regulations identify several categories of assessment procedures available to Trustees, including but not limited to: procedures conducted in the field or laboratory; model-based procedures; and/or literature-based procedures (15 C.F.R. § 990.27(b)). If a range of assessment procedures providing the same type and quality of information is available, the most cost-effective procedure must be used (15 C.F.R. § 990.17(c)). Finally, assessment procedures must contribute to injury determination (i.e., by establishing the spatial and temporal magnitude of exposure to oil, the pathways of exposure, and/or the presence of injury, as described in 15 C.F.R. § 990.51) and/or injury quantification (i.e., quantifying the degree, spatial and temporal extent of injury to natural resources and the associated reduction in services caused by the injury, as described in 15 C.F.R. § 990.52).

The goal of the Department's assessment is to determine how natural resources over which the Department exercises jurisdiction may have been impacted by the Oil Spill. Therefore,

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many of the Department's assessment activities focus on specific resources, such as DOI lands like the National Parks and Wildlife Refuges, migratory birds and nesting sea turtles. However, these individual resources are an integral part of the larger Gulf of Mexico ecosystem. Thus, the Department's assessment activities also relate the resource-specific effects to a more holistic view of the effects of the discharged oil to the Gulf of Mexico ecosystem. The Department continues to provide leadership in certain areas of the assessment, such as Birds (2014 IPC Activity #4); Sand Beaches (2014 IPC Activity #7) and Response Information (2014 IPC Activity #8). As of September 30, 2013, the Department completed or is participating in more than 50 NRDA investigations.

Many ongoing and proposed activities in 2014 involve the analysis of field data needed to inform estimates of the magnitude of injury and associated reduction in services, including monitoring for possible recovery of impacted resources. Models and literature-based methods also are used in selected investigations. The scale and cost of each proposed activity was carefully considered with co-Trustees, and represents a balance between the need for cost-effective assessment efforts and the geographic scale and complexity of this Oil Spill.

The Department determined the assessment procedures identified in this document meet the requirements set forth in the OPA regulations, and are integrated with (and not duplicative of) other NRDA data collection and analysis activities. In addition to coordinating with co-Trustees, the Department has coordinated these assessment procedures and the content of this Claim with NOAA's 2014 Claim (*NOAA Third Interim, Partial Claim for Assessment and Restoration Planning Costs July 11, 2013*) to further ensure consistency and the complementary nature of the assessment and restoration planning activities. Modifications to the identified assessment procedures may be made because of the participation of BP in the NRDA pursuant to 15 C.F.R. § 990.14. A description of each assessment activity's purpose and related implementation information is provided in subsequent sections of this document, and in many cases, in the related work plans. (A list of proposed assessment and restoration planning activities is included in Appendix A).

The Department regularly posts final NRDA work plans on the Internet. For the official record of Trustee NRDA investigations, visit the *Deepwater Horizon* Oil Spill NRDA Administrative Record. As of September 30, 2013, the site contains links to more than 145 NRDA work plans. Many of these work plans provide detailed technical methods and implementation information, and are incorporated by reference into this Claim.

NRDA work plans and study-related data

<http://www.gulfspillrestoration.noaa.gov/oil-spill/gulf-spill-data/>

NRDA Administrative Record

<http://www.doi.gov/deepwaterhoizon/adminrecord/index.cfm>

As described in NOAA's 2014 Interim, Partial Claim, almost all of the earlier assessment workplans were focused intentionally on the data collection phase after the Oil Spill.

However, more recent assessment plans for Department-led assessment activities address Trustee activities focused on data compilation, synthesis, analysis, interpretation, reporting, and restoration planning. Many of the Department's activities in this Claim are focused on the analysis and interpretation of scientific data necessary to quantify injuries from the Oil Spill, complete NRDA analyses, and plan for restoration. Some data collection including field work is still proposed as a continuation of assessment of potential injuries identified in the first days of the Oil Spill or to reduce uncertainties in the injury determination, including possible monitoring of recovery of impacted resources.

2.1. Overview of How DOI Estimated Assessment Costs for Each Activity

The Department is planning to complete many NRDA assessment activities by the end of 2014 (including injury quantification and draft technical and interpretive reporting). To this end, the 2014 Claim is largely based on the amount of technical effort required to develop the Department's interpretation of injuries to natural resources and services from the Incident and conduct region-wide restoration planning with the co-Trustees. Data management, scientific documentation, and legal review of analyses and technical deliverables are included as part of this Claim. Also included in the cost estimates is the level of effort expected for the anticipated amount of co-Trustee and RP coordination, laboratory and other data analysis schedules, and the number of anticipated work products, including finalization of large environmental and chemical datasets. Some of the proposed assessment activities are extensions of analysis and interpretation efforts begun in 2013, which, for a variety of factors, such as the seasonality of the data collection efforts, laboratory space limitations, and Trustee review of data and interpretive reports, have not yet been completed.

The Budget Summary for Assessment and Restoration Planning Activities (Exhibit 1) reflects contractor costs only, consistent with current Department practice in this case. Departmental personnel and travel costs affiliated with a particular procedure, where Departmental employees themselves are implementing the procedure as well as general coordination, oversight, operations and analysis costs, are included in the Department's Coordination, Oversight, Implementation and Analysis budget in Section 10 and Exhibit 2.

A description of each activity is provided in subsequent sections of this Claim. Pursuant to current Department practice in this case, a work plan describing the activity in more detail will be presented to BP (and the National Pollution Funds Center ("NPFC") separately, where appropriate (i.e., salary and early restoration activities will not have a separate detailed work plan). Additional budget detail per activity can be provided upon request. Brief summaries of each procedure are provided below.

As more information about the impacts of the Oil Spill becomes available, the Department expressly reserves its right to supplement the assessment procedures identified herein through additional claims for assessment and restoration planning costs. Modifications to

the identified assessment procedures may be made because of the participation of BP in the NRDA pursuant to 15 C.F.R. § 990.14.

The Department structured this Claim to facilitate a request for adjudication to the NPFC after 90 days if the Responsible Party(s) declines to pay the Department's assessment and restoration planning costs. Except for two proposed activities, DOI salary and Early Restoration Planning, each proposed activity will have a detailed work plan. As per current practice in this case, the Department will transmit a work plan to BP along with an "Invoice/Request for Advance Funding." This transmittal will satisfy presentment as required under the NPFC regulations. Ninety (90) days after the receipt of the Invoice/Request for Advance Funding, the Department may request adjudication of any work plan for which the Responsible Party declines to pay.

3. Endangered/Threatened Sea Turtles

The Department's assessment activities focus on nesting sea turtles whereas the assessment activities of our co-trustee, NOAA, focus on oceanic and neritic turtles. Under this activity, the Department will continue to integrate and summarize data and findings from ongoing efforts to document exposure and injury to sea turtles from the *Deepwater Horizon* Oil Spill. Data and analysis from the nesting sea turtle studies will be incorporated into the Sea Turtle Exposure and Injury Assessment Report, as described in NOAA's Third Interim Partial Claim. The end product of this integration effort will be the production of a Trustee sea turtle interpretive report which will summarize data and findings for sea turtles impacted by the *Deepwater Horizon* Oil Spill. The Department will also be an active participant in the Life History Tables Working Group described in NOAA's Third Interim Partial Claim. Under this activity, the Department requests funding for a discrete assessment activity, a continuation of prior pre-assessment and assessment studies in this Oil Spill, the analysis and integration of the 2013 telemetry tag data into the exposure and injury assessment report. This activity also includes the Department's 2014 activities related to endangered/threatened sea turtles assessment data management activities, such as additional quality assurance/quality control ("QA/QC") activities, including data verification and validation, in coordination with co-Trustees and with BP, as appropriate.

An additional assessment activity for which the Department requests funds is support to integrate findings of the nesting sea turtle exposure and injury assessment reports activity with the ongoing efforts by NOAA to document exposure and injury to oceanic and neritic sea turtles. These funds are in addition to those identified in NOAA's Third Interim Partial Claim as it is anticipated that multiple people with complementary skill sets may be required to develop the integrated report. The funds identified for this activity will be expended by the Department in coordination with, and not duplicative of, expenditures by NOAA.

3.1. 2014 IPC # 1: Telemetry Analysis for Nesting Kemp's Ridley and Loggerhead Sea Turtles (2013) and Sea Turtle Sample/Data Management

Purpose of Activity and Injury Assessment Need

This proposed assessment activity will fund the integration of the 2013 satellite telemetry information into the state space model being developed as part of the ongoing NRDA. The analysis and integration will include satellite data from the Kemp's Ridley and Loggerhead sea turtles that were tagged as part of the cooperative 2013 field nesting season, as well as the integration of any new satellite data from satellite tags previously affixed during the 2010-2012 field nesting seasons. In addition, this proposed assessment activity will fund data handling/data management for data generated from the analysis of samples under the 2010-2011 and 2012 Turtle Analytical Plans, as well as sample handling for samples collected in 2010-2013.

Methods

This proposed assessment activity would be an addendum to the 2010 and 2011 Pre-assessment Plans, the 2012 Assessment Plans, funded by the NPFC, and the cooperative 2013 Kemp's Ridley and Loggerhead Sea Turtle Nesting Assessment plans.

Relationship to Other Activities and Data

Data analyzed will be directly comparable with historic data and NRDA data (2010-2013). No other trustee is conducting assessment activities on nesting and hatchling sea turtles. The Principal Investigators for the nesting sea turtle assessment studies have data and sample managers who are separate from the contractor support that the Department has engaged for the overall data quality assurance/quality control activities (see 2014 IPC Activity #9). The Sea Turtle data and sample managers will be involved in the overall data quality assurance/quality control activities, including, as appropriate, data verification and validation efforts, and the coordination of long term storage for the samples collected as part of the nesting sea turtle assessment activities.

Coordination and Implementation

The telemetry analysis implemented as part of this NRDA will be coordinated with co-trustees and integrated into the Sea Turtle Exposure and Injury Assessment Report described in NOAA's Third Interim Partial Claim. The ongoing data management and sample handling will also be implemented as part of the Department's case-wide quality assurance/quality control effort, including data verification and validation and integration into the long term storage facility.

Timeframe

The Department's goal is to initiate this proposed activity no later than January 2014.

3.2. 2014 IPC # 2: Integration of Sea Turtle Exposure and Injury Assessment

Purpose of Activity and Injury Assessment Need

The purpose of this activity is to integrate findings of the nesting sea turtle exposure and injury assessment reports activity with the ongoing efforts by NOAA to document exposure and injury to oceanic and neritic sea turtles. The end product of this effort will be the production of a Trustee sea turtle interpretive report which will summarize data and findings for sea turtles impacted by the *Deepwater Horizon* Oil Spill.

Methods

This activity is for support to document and describe exposures and quantify injuries based on results from the 2010-2011 and 2012 Turtle Analytical Assessment Plans. Additional analysis of other available data and information that will elucidate exposure and injury to sea turtles as a result of the *Deepwater Horizon* Oil Spill may also occur under this activity.

Relationship to Other Activities and Data

This effort is a joint effort with NOAA and will be integrated into the Sea Turtle Exposure and Injury Assessment Report described in NOAA's Third Interim Partial Claim. The effort will be coordinated with co-trustees.

Coordination and Implementation

This effort is a joint effort with NOAA and will be integrated into the Sea Turtle Exposure and Injury Assessment Report described in NOAA's Third Interim Partial Claim. The effort will be coordinated with co-trustees.

Timeframe

This proposed activity would be initiated as early as January 2014.

4. BIRDS

Thousands of visibly oiled birds were collected dead and many thousands more were observed oiled during and following the *Deepwater Horizon* Oil Spill. The Trustees are assessing injuries to birds caused by exposure to oil using two primary approaches.

The first approach, the Beached Bird Model (BBM), will be used to estimate avian mortality. The second approach, the Live Oiled Bird Model (LOBM), will be used to estimate injury to birds that were exposed to oil, but were not immediately killed or sufficiently incapacitated to capture. In addition to these two models, the Trustees are also investigating additional injuries to birds from the Oil Spill that may not be captured in the two primary approaches.

The Department, in coordination with co-trustees, will be requesting adjudication from the NPFC for one assessment plan, *Background Deposition of Bird Carcasses on Walkable Shorelines and Marshes*, initially described in the Department's Second Interim, Partial Claim (2013 IPC Activity #5) and previously presented to BP. BP declined to participate cooperatively in or

fund the *Background Deposition of Bird Carcasses on Walkable Shoreline and Marshes* (See correspondence B. Stong to D. McClain, dated August 6, 2013). If adjudication is successful, field work would be initiated in late spring 2014 and continue through the summer, during a time period consistent with the Oil Spill.

The Trustees and BP are currently engaged in discussions concerning a second field assessment activity, *Background Oiling Rate for Live Birds* (2013 IPC Activity #7). This assessment activity was included in the Department's 2013 Interim Partial Claim and initially presented to BP on April 20, 2013. In the near future, the Department, in coordination with co-trustees, will send to BP a revised plan, based, in part on correspondence received from BP on September 6, 2013. For clarity, since this activity was previously included in the Department's 2013 IPC and discussions on this activity are ongoing, it is not included in this Claim. For 2014, the Department does not anticipate field work in addition to the efforts described in these two assessment plans.

The Department's 2014 assessment activities related to the bird assessment will be focused on data management activities, such as additional quality assurance/quality control ("QA/QC") activities, including data verification and validation, in coordination with co-Trustees and with BP, as appropriate. Additional effort will be focused on the development, review, including peer review, and finalization of deliverables such as data reports and interpretive reports.

4.1. 2014 IPC # 3: Integration of Migratory Bird Exposure and Injury Assessment

Purpose of Activity and Injury Assessment Need

The purpose of this activity is to integrate findings of the migratory birds exposure and injury assessment reports. The end product of this effort will be the production of a Trustee bird interpretive report which will summarize data and findings for all of the migratory bird assessments conducted as part of the *Deepwater Horizon* Oil Spill identifying impacts. This integration of information will enable the determination of appropriate restoration projects to compensate for injury.

Methods

This activity is for support to assemble a unified, comprehensive assessment of avian injury through integrating the findings and results from the dozens of migratory bird Pre-Assessment and Assessment Plans regarding exposure, causation, and spill-related harm. Additional analysis of other available data and information that will elucidate exposure and injury to birds as a result of the *Deepwater Horizon* Oil Spill may also occur under this activity.

Relationship to Other Activities and Data

This effort will be coordinated with co-trustees and other assessment efforts ongoing in the *Deepwater Horizon* NRDA.

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Coordination and Implementation

This effort will be coordinated with co-trustees and other assessment efforts ongoing in the *Deepwater Horizon* NRDA.

Timeframe

This proposed activity would be initiated as early as January, 2014.

5. Endangered/Threatened Fish

The Department's 2014 activities related to the endangered/threatened fish assessment will be focused on data management activities, such as additional quality assurance/quality control ("QA/QC") activities, including data verification and validation, in coordination with co-Trustees and with BP, as appropriate. Additional effort will be focused on the development, review, including peer review, and finalization of deliverables such as data reports and interpretive reports. Data and analyses generated as part of these efforts, as well as other ongoing activities to document exposure and injury to fish, including NOAA's modeling efforts, will need to be synthesized into an overall injury assessment.

6. DOI Managed Lands and Facilities

6.1. 2014 IPC # 4: 2013 Addendum: Assessment of Jean Lafitte National Historic Park and Preserve ("JELA") Submerged Aquatic Vegetation

Purpose and Injury Assessment Need

Previous assessment data from JELA, obtained in 2010, 2011 and 2012, suggest that the Submerged Aquatic Vegetation ("SAV") community in JELA was likely negatively affected by the increased freshwater flow to JELA during the Oil Spill response. Additional samples and field observations are needed to evaluate the extent and magnitude of observed changes and to determine if recovery to baseline conditions is occurring or has occurred. This proposed assessment activity is a continuation of the Assessment of SAV at JELA.

Methods

Sample sites and field methods will follow the three previous JELA pre-assessment and assessment plans in the *Deepwater Horizon* NRDA. Data will be collected for water quality, Submerged Aquatic Vegetation Relative Abundance, and Floating Aquatic Vegetation percent cover and relative cover.

Relationship to Other Activities and Data

Data collected from this assessment will be directly comparable with historic data (Porrier et al, 2009) and NRDA data (2010-2012).

Coordination and Implementation

This effort is coordinated with co-Trustees.

Timeframe

This proposed activity would include one field survey in the fall of 2014.

6.2. 2014 IPC # 5: 2014 Addendum: Assessing Recovery of Submerged Aquatic Vegetation Propeller Scars at Gulf Islands National Seashore

Purpose and Injury Assessment Need

In 2012, DOI and BP entered into a cooperative agreement to assess recovery of the 9 identified response-related no-action propeller scars at Gulf Islands National Seashore (“GUIS”). (“Deepwater Horizon/Mississippi Canyon 252 Oil Spill Plan for Assessing Recovery of Submerged Aquatic Vegetation Propeller Scars at Gulf Islands National Seashore”). Pursuant to the Assessment Plan, initial field work was completed in July, 2012. In Spring 2013, the Department determined that field results did not meet the performance criteria defined in the Assessment Plan, at 5 of the original 9 sites. In Spring 2013, DOI and BP entered into a cooperative agreement for additional field work in fall, 2013 to assess recovery of the 5 identified response-related no-action propeller scars at GUIS. This proposed assessment activity is a continuation of the Assessment of the recovery of the GUIS Propeller Scars and will be pursued if it is determined that field results from the 2013 monitoring do not meet the performance criteria defined in the Assessment Plan.

Methods

The methods are the same as those described in the 2012 *Deepwater Horizon* NRDA cooperative plan, *Deepwater Horizon/Mississippi Canyon 252 Oil Spill Plan for Assessing Recovery of Submerged Aquatic Vegetation Propeller Scars at Gulf Islands National Seashore National Seashore* and 2013 Addendum.

Relationship to Other Activities and Data

Data collected from this assessment will be directly comparable with historic data from GUIS (2006-2007) and NRDA pre-assessment data (2010-2011) and assessment data (2012, 2013). The original nine scars were identified by the Trustees and BP in a previously implemented plan and determined at the time to not warrant primary restoration due to a variety of factors.

Coordination and Implementation

This assessment activity is similar to and is coordinated with ongoing assessment and restoration activities through the SAV TWG. Emergency restoration of SAV beds injured by the response effort is ongoing. This monitoring effort inside GUIS is separate from and not duplicative of the monitoring work conducted through the SAV TWG and the Emergency Restoration effort.

Timeframe

This proposed activity would include one field survey in the fall of 2014.

6.3. 2014 IPC # 6: Assessing Submerged Oil Mats by Remote Sensing Survey and Diver Characterization at Gulf Islands National Seashore

Purpose and Injury Assessment Need

More than three years after the *Deepwater Horizon* Oil Spill, NPS beaches at GUIs continue to be re-oiled by Submerged Oil Mats (“SOMs”). The SOMs continue to impact NPS resources such as seagrass, sea turtles, fish, and threatened and endangered nesting shorebirds. These assessment activities will collect key data necessary to model the location, formation and re-suspension of the oil/sand mixture that constitute SOMs. Quantification of SOMs will allow NPS to delineate injured subtidal habitat for purposes of primary and/or compensatory restoration planning.

Methods

Divers will be deployed to examine NPS bottomlands at GUIs with a high probability of having SOMs. These areas will be selected based on GIS data in the Environmental Response Management Application (ERMA; e.g. beach re-oiling, past oiling, predictive modeling and remote sensing data).

Diver deployment will include direct visual examination of areas of interest combined with video and photographic documentation. Sub-surface sediments will be examined by using a hydroprobe and push cores in a systematic grid pattern in high probability areas.

Remote sensing will consist of geo-referenced high-frequency side scan sonar coupled with a ROXANN acoustic bottom classification device to locate SOMs or seafloor topography that are conducive to SOM formation or concentration.

Relationship to Other Activities and Data

Data collected from this sampling will be directly comparable to historic data (2006-2007) and SCAT/NRDA data (2010-2011). Data and analyses generated as part of these efforts, as well as other ongoing activities to document exposure and injury to the shoreline, SAV and other nearshore habitat and resources, including NOAA’s shoreline efforts, will need to be synthesized into an overall injury assessment.

Coordination and Implementation

In August 2013, while reserving its rights to raise additional legal and evidentiary defenses should the Trustees rely on this effort in its assessment, BP agreed to fund the first year of this assessment activity to collect key data necessary to model the location, formation and re-suspension of the oil/sand mixture that constitute SOMs. (See Correspondence, B Stong to D. McClain, August 27, 2013). The assessment activity included in this Third Claim represents the second year of a proposed three year study to characterize and model the location, formation and re-suspension of the oil/sand mixture that constitute SOMs. These assessment activities will be managed and administered by the NPS Submerged Resources Center. The Submerged Resources Center will coordinate directly with Gulf Islands

Resources staff and external collaborators working on similar issues as a part of the *Deepwater Horizon* response.

Timeframe

This proposed activity will occur in the fall of 2014. Data generated from the study will be reviewed, verified, validated, and analyzed by December 2014.

7. Other Assessment Activities

7.1. 2014 IPC # 7: Sand Beach Injury Assessment

Purpose and Injury Assessment Need

Beaches across the Gulf have experienced surface and subsurface oiling as a result of the *Deepwater Horizon* release. Re-oiling from re-mobilization of buried oil and submerged oil mats in the nearshore environment is continuing today. These oiling events along with the initial release of oil have exposed natural resources to oil and have required response actions to remove oil from sand beaches from Florida to Texas. These response actions have used and are using various manual and mechanical methods to remove oil and debris from the sand beaches that have resulted in modification or impairment of these habitats and caused injury to natural resources (“Response Injury”). In addition, a literature review on the effects of oil in beach habitats has been conducted by co-trustees working on the Shoreline assessment which further supports some level of injury due to habitat modification and oil fouling compared to unoiled beaches. As the oiling of beaches and response continues, the Department and co-trustees continue to assess impacts to sand beach habitats due to both *Deepwater Horizon* oiling and injury caused by response actions.

Studies have demonstrated a negative relationship between oiled beaches and beach invertebrate communities and habitat quality. Oil-related sand beach injury is being assessed by the Trustees using the shoreline oil exposure map currently under development within the Shoreline TWG. This map outlines the extent, duration and degree of oiling across various stretches of shoreline impacted by the *Deepwater Horizon* incident. Additional work will evaluate the impacts to sand beach ecosystem services resulting from various degrees of oiling.

Coupled with oil-related injuries, the Department and co-trustees are also assessing the effects of Response Injury to sand beach habitats. The objective of the sand beach Response Injury assessment is twofold. First, compile the various sources of information that may be used to assess injury related to response actions on the shoreline, and second, to categorize and rank the effects of the response action on the sand beach habitat. The information on the temporal and spatial extent of response-related injuries is scattered among many organizations, agencies and databases and has been difficult to obtain. (See description of assessment activity 2014 IPC #8: Response Information Data Management, Infrastructure, Administration and Assessment.). The first objective of our Assessment (compile the various sources of information) requires contractor support.

Methods

Oil-related sand beach injury is being assessed based on the shoreline oil exposure map being developed by the Department and co-trustees. The associated oiling categories and extents within that map will be utilized, along with literature-based evaluations and other studies currently underway, to determine the degree of impacts to sand beach ecosystem services. The identification and collection of information about previous and ongoing response efforts for the *Deepwater Horizon* incident are not completed. This proposed activity will clearly define the extent and duration of injury to the sand beach habitat by acquiring and organizing new response information to categories of potential injury and/or correlating response actions.

Relationship to Other Activities and Data

The Department is the lead for assessing injuries to the sand beach habitat resulting from the Oil Spill. The proposed activity related to the sand beach habitat is a continuation of work conducted in 2011 and 2012. To avoid duplication, the proposed Response Injury assessment for sand beach would be coordinated with assessment activity 2014 IPC #8: Response Information Data Management, Infrastructure, Administration and Assessment (described below).

Coordination and Implementation

The activity is coordinated with co-Trustees.

Timeframe

This proposed activity would occur continuously during the period of the Claim, January - December 2014.

7.2. 2014 IPC # 8: Response Information - Data Management, Infrastructure, Administration and Assessment

Purpose and Injury Assessment Need

Response activities related to the Oil Spill are continuing three years after the wellhead was capped. In addition, re-oiling is still occurring in some places and warrants the continuation of response actions. The geographic scope and duration of the Oil Spill has created a voluminous record of information, reports, and other documentation related to response actions. This information is useful for the Trustees to quantify response-related injuries to natural resources and their services. Response Injury is an injury type separate from oil exposure and, in some cases, may significantly affect the recovery rates of different habitats and resources. The U.S. Coast Guard has made available to the Trustees nearly 12 terabytes of response information. However, the data is not in an accessible, easily searchable form and all the data may not be relevant to the Trustees NRDA objectives. Additionally, BP and the Trustees have been discussing the ability for the Trustees to have access to the database that BP has developed for the response information.

This assessment activity includes three parts: 1) review of response information and narrowing the data to only information relevant to the Trustees NRDA; 2) the design of data

infrastructure and system architecture based on the volume and type of data and the access needs of the Trustees for purposes of the natural resource damage assessment; and 3) review and data mining of existing response information.

Methods

This activity includes efforts to obtain, review and organize response information to be used by the Trustees to determine injuries to natural resources and their services. Additionally, the Trustees will need to determine whether existing databases (i.e., Coast Guard, BP) are sufficient for their purposes or whether to develop and maintain a separate, searchable database to house this information.

Relationship to Other Activities and Data

In May 2013, BP provided initiate funding for this activity in the amount of \$739,959. Additionally in May 2013, the Trustee representatives met with BP to review the database(s) that BP has developed for inventorying, maintaining, and searching response information. A portion of the initial funding is being used to obtain technical support for the Trustees to discuss various technological interfaces and other technology related questions. Communication and coordination among the Trustees and between the Trustees and BP is ongoing and will continue through 2014. Identification and organization of response documentation potentially demonstrating injury to natural resources and their services will be used to either support existing injury claims or alternatively develop injury claims separate and apart from ongoing assessment studies.

Coordination and Implementation

The Department is the lead for the Trustees Response Injury efforts. This work will involve close coordination with our co-Trustees. At the present time, work is continuing on an Assessment Plan which would identify the activities related to this effort in more detail.

Timeframe

This proposed activity would be initiated in 2014, and may continue through Calendar Year 2014. Any additional requests for funding would account for the initial funding previously received by the Department.

8. Injury Assessment, Management and Administration

8.1. 2014 IPC # 9: 2014 Addendum: Technical and Logistical Support for DOI's Deepwater Horizon Oil Spill NRDA

Purpose and Injury Assessment Need

The Department leads several areas of the *Deepwater Horizon* NRDA (i.e., Birds, Sand Beach, Response Information, nesting sea turtles, etc.). Numerous field and analytical work plans have been developed and are continuing to be developed as part of the ongoing NRDA. In addition, analyses and interpretation of data collected throughout the course of the NRDA are being generated. Support is needed to assist in managing the ongoing assessment activities, including study implementation, Trustee coordination, and data analysis and

management. As discussed in the individual resource categories above, data management activities, such as additional quality assurance/quality control (“QA/QC”) activities, including data verification and validation, in coordination with co-Trustees and with BP, as appropriate, will be a focal area of the 2014 NRDA. Additional technical support is needed for the collection and analysis of information that is generally available which bears on the questions of effects of exposures and of injuries to migratory birds from oil. General technical support for completion of injury assessment is needed. This technical support includes extent and quantity of injury, review, including peer review, and finalization of deliverables such as data reports and interpretive reports. Technical support for the synthesis and integration of DOI-generated data and analyses with other ongoing activities to document exposure and injury to resources and their supporting habitat, including NOAA’s shoreline, toxicity, and modeling efforts, is also needed. In addition, related but separate NRDA activities led by other co-Trustees are integral to improved understanding of the effects of the Oil Spill on natural resources and development of the Programmatic Damages Assessment and Restoration Plan (“PDARP”). The Department has also identified the need for technical and logistical support to improve co-Trustee coordination and PDARP development.

Relationship to Other Activities and Data

As described in the Department’s 2013 Interim Partial Claim, BP funded \$1,188,628 for two assessment plans: *Quality Assurance and Quality Control Support for U.S. Department of Interior Managed Data Collected During the Deepwater Horizon/MC 252 Oil Spill Natural Resource Damage Assessment*, and *Technical and Logistical Contractor Support for U.S. Department of the Interior Deepwater Horizon/MC 252 Oil Spill Natural Resource Damage Assessment* for CY 2013. With these funds, the Department established a cooperative process for case-wide verification and validation of data and began that process. BP provided the Trustees with a list of priorities for cooperative verification and validation for bird data and that has been incorporated into our priorities. The Trustees and BP have successfully completed the cooperative verification and validation of the Searcher Efficiency study (BS #1B) data, and the cooperative process on the Carcass Persistence (BS #1C) data is currently underway. We anticipate that in the near future many datasets will be shared with BP for cooperative verification and validation, such as, but not limited to, datasets from the studies listed below.

- Beached Bird Surveys (BS #1/1A)
- Carcass Drift (BS #1D)
- Aerial Bird Surveys (BS #2)
- Secretive Marshbird (BS #3)
- Colonial Waterbird (BS #4)
- Nesting and Hatchling Loggerhead Sea Turtles and Loggerhead Sea Turtle Nests 2010
- Nesting and Hatchling Loggerhead Sea Turtles and Loggerhead Sea Turtle Nests 2011
- Beach Mouse Habitat Assessment Plan

Timeframe

This proposed activity would occur continuously during the period of the Claim, January - December 2014.

8.2 2014 IPC # 10: Comprehensive Database for DOI-lead Studies, Analytical and Observational Data, Infrastructure and Administration

Purpose and Injury Assessment Need

A large number of samples, instrument files, photographs, and visual observations were acquired to quantify injury and to scale appropriate restoration needed because of the Oil Spill. The Department, in coordination with NOAA and the Data Management TWG, has led and continues to lead the effort to ensure the preservation of all such files and data for DOI-lead plans. This effort has entailed tracking, storage, maintenance, and sharing of these data with relevant TWGs and the wider Trustee community. With limited exception, data generated from implementation of approved NRDA work plans for which the Department is the lead are entered into the DOI *Deepwater Horizon* NRDA database.

Methods

This activity includes normal database maintenance and technical assistance. The Department's database will be expanded to include additional DOI *Deepwater Horizon* NRDA data and features will be added and/or upgraded to facilitate cooperative data verification and validation of data sets. The DOI *Deepwater Horizon* NRDA database will be upgraded to communicate with NOAA NRDA, the NOAA Data Integration, Visualization, Exploration, and Reporting (DIVER), and the State of Louisiana's LOSDMS databases.

Relationship to Other Activities and Data

Full operation of the DOI *Deepwater Horizon* NRDA Database will enable the Trustees to deliver quality-checked datasets to BP, co-Trustees, and DIVER where, ultimately (upon approval by the *Deepwater Horizon* NRDA Trustee Council), the validated data sets will be made available to the public. The storage and management of data generated by DOI-led assessment activities are necessary to facilitate access to assessment files and data by the Trustees, BP and the general public. Furthermore, a comprehensive system ensures proper document and data preservation necessary for litigation.

Coordination and Implementation

The DOI *Deepwater Horizon* NRDA database will store data generated by DOI-led pre-assessment and assessment activities during this NRDA. With limited exception (i.e., data from the 2010 and 2011 JELA SAV, the 2010 Loggerhead Nesting Plan), this data is otherwise not stored or is maintained in ERMA, noaanrda.org, Photologger or Query Manager.

Timeframe

This proposed activity would occur continuously during the period of the Claim, January - December 2014.

8.3 2014 IPC # 11: Comprehensive Document Management System for Assessment & Restoration Planning Records

Purpose and Injury Assessment Need

The purpose of this activity is to provide a *Deepwater Horizon* Document Management System that improves DOI staff efficiency and productivity by opening access to Oil Spill-related information, while protecting the integrity and availability of mission critical information. This system is distinct from the Data Management System that houses DOI analytical databases and results. It has a separate architecture and serves separate needs. It is also distinct from, but will be compatible with, the Document Management System that is included in NOAA's Third Interim, Partial Claim for Assessment and Restoration Planning Costs (Deepwater Horizon Electronic Content Management and Oil Pollution Act Administrative Record Management System) and DOI's Document Management System for Assessment Administrative Record (2014 IPC #12: Comprehensive Document Management System for Assessment Administrative Record).

Valuable information related to DOI's continuing study of the Oil Spill's effect on natural resources, including habitats and species in and using the Gulf of Mexico, has accumulated and is stored in locations across DOI staff offices and behind multiple fire walls. These data have critical operational and strategic value, yet the bulk of this information is currently housed in individual email accounts, local area network shares, and on device hard drives. Access to this information is essential for enabling DOI to utilize existing research (baseline data) and data collected and produced by researchers and scientists for decision-making related to damage assessment and restoration planning. Many DOI employees require real time access to Oil Spill related information in a system where it is organized and can be located, searched, and retrieved without being able to make changes to stored information.

Timeframe

This proposed activity would occur continuously during the period of the Claim, January - December 2014.

8.4 2014 IPC # 12: Comprehensive Document Management System for Assessment Administrative Record

Purpose and Injury Assessment Need

As the Federal Lead Administrative Trustee for this NRDA, DOI and the Trustees announced the establishment and opening of the Administrative Record for this NRDA ("AR") on October 1, 2010 (See Notice of Intent to Proceed with Restoration Planning, 75 Fed. Reg. 06800, at 60802). The establishment of the AR is in accordance with 15 C.F.R. § 990.44 and .45. The AR is publicly accessible and is intended to include documents considered by the Trustees during the pre-assessment, assessment, and restoration planning phases of this NRDA. The Department has lead responsibility for the AR, however the underlying effort to identify, collect, organize, review and approve materials for inclusion in the AR involves all Trustees. The costs to provide for and maintain a sufficient AR have increased rapidly and exponentially as more data is collected, study plans are finalized, and technical reports are written. This activity supports the continued operation, management,

improvement and use of the *Deepwater Horizon* Comprehensive Document Management System for Assessment Administrative Record.

Methods

Management of the Administrative Record reflects five major components, described in more detail below: (1) identification, routing, and management of legal records from the assessment; (2) leading co-Trustee, joint records management and coordination, including for Trustee Council level legal records management, legal reviews, and public accessibility; (3) contactor support to design, implement and manage the administrative record process from identification through approval and inclusion in the record; (4) hardware and data architecture for legal document management; and (5) external website support to facilitate public access and usability.

- (1) Identification/management of legal assessment records for the AR from DOI-led or managed activities—Includes searches, collection, organization, routing, and management of AR records from DOI-led TWGs, NRDA operational support groups, et., that are candidate for inclusion in the NRDA AR;
- (2) Leading joint legal management of records with co-Trustees—as the Lead Administrative Trustee, DOI will take a leading role in providing legal guidance for AR record searches, to define protocols and platforms for joint legal reviews, and will provide services appropriate to support AR decision-making processes at the Trustee Council level, including records management, joint legal review, redaction review for DOI records, and public accessibility;
- (3) Development of a technology system to facilitate the efficient collection, review and disposition of candidate records for inclusion in the NRDA AR. In addition, to the architecture of the Administrative Record Review process, DOI will hire contractor support on behalf of the Trustees to manage the Assessment Administrative Record review process;
- (4) Hardware and data architecture – Candidate Trustee records for the AR extracted from DOI’s document management systems (described above) will be voluminous, and will only increase with inclusion of candidate records from other Trustees. Existing data and records management systems are not sufficient to support the Trustees’ legal record review obligations for the AR and this NRDA. The Department intends to create a system for the AR that is compatible with NOAA’s document management systems, as well as DOI’s larger, more comprehensive document management system (described in activity above). An AR-focused document repository for the Department and our co-Trustees will require specially designed software and hardware, as well as information management architecture for tagging, cataloging, and creating document workflows for processing and reviewing documents. Staff and contractor time are required to design the architecture and process the documents in workflows that have been agreed to by all of the Trustees. These activities will occur continuously over the entire span of CY 2014;
- (5) Additional web support to facilitate the public’s ability to access the Administrative Record. This will include, but is not necessarily limited to, re-design of the website.

Relationship to Other Activities and Data

The AR is publicly accessible and is intended to provide the public with documents considered by the Trustees during the pre-assessment, assessment, and restoration planning phases of the NRDA performed in connection with the Oil Spill.

Coordination and Implementation

This activity is fully coordinated with the co-Trustees.

Timeframe

This proposed activity will occur continuously during the period of the Claim, January – December 2014.

9. 2014 IPC # 13: Early Restoration Planning

Purpose and Injury Assessment Need

The Department requires technical support to continue its responsibilities under the “Framework for Early Restoration Addressing Injuries from the *Deepwater Horizon* Oil Spill”. This agreement requires that the Trustees work with BP to develop and assess a set of restoration projects intended to provide early restoration of injured natural resources and the services those resources provide. Specifically, assistance is needed to identify the benefits of each restoration project identified by Department staff, including appropriate metrics (biological, physical, human use) that could be used to describe the benefits generated by each project, the time period over which those benefits will be generated, and the geographic scope of benefits, etc. These benefit measures will be used in negotiations with BP over the “offsets” (i.e., credits against natural resource damages) that will be provided by each project. This proposed activity is for contractor support for the Department’s continued involvement in the development and discussion of specific early restoration projects.

Early restoration projects that are successfully negotiated with BP must be shared with the public to solicit comments through early restoration plans along with the associated National Environmental Policy Act (NEPA) analysis and documentation. The Department has taken the lead for the development and coordination of the early restoration planning efforts and appropriate NEPA and environmental compliance consultations. Contractor support is needed to manage the production of a programmatic environmental impact statement (PEIS) as well as early restoration plans and environmental reviews that will be a part of or tiered from the PEIS. Consultations on environmental compliance regulations and statutes are a specific part of the NEPA analysis.

Additionally, National Historic Preservation Act Section 106 (Section 106) consultations will need to be conducted with various Tribal Nations that have interest in the Gulf of Mexico. To expedite the consultation process the Department is developing a Programmatic Agreement with the interested Tribes as well as entering into a contractual agreement to complete the consultations.

The HDR database compiled during the response to the DWH Oil Spill likely represents the largest single data collection effort ever conducted on the Gulf of Mexico. The information contained in the database will greatly enhance the understanding of the cultural and historic resources of the Gulf Coast. This information will be vital to the compliance with Section 106 as the early restoration planning process moves forward. The Section 106 process is, at its core, an evaluation of the impact of federal government activities on the cultural and historic landscape through data analysis and data collection. This database will increase the speed of compliance by informing the process and reduce the cost associated with compliance by reducing duplicate efforts to collect data it already contains. The Department is working with the U.S. Coast Guard in order to get access to this database. The Department will need contractor support in order to access the database and possibly the design of data infrastructure and system architecture based on the volume of data and the access needs of the Trustees for purposes of the natural resource damage assessment, review and data mining of the information.

Timeframe

This proposed activity would occur continuously during the period of the Claim, January - December 2014.

10. 2014 IPC # 14: DOI Coordination, Oversight, Implementation and Analysis

Purpose and Injury Assessment Need

Coordination, oversight, and planning costs are the administrative, legal, enforcement, monitoring, oversight and public participation costs as set forth in the definition of “reasonable assessment costs” in the OPA regulations at 15 C.F.R. Part 990. These include, among other things, the cost of participation in TWG activities, Trustee Council participation, co-trustee coordination, communication and coordination with RPs, and public outreach. These costs are estimated based on anticipated activities through 2014.

Timeframe

This proposed activity would occur continuously during the period of the Claim, January - December 2014.

Appendix A: List of Proposed Assessment and Restoration Planning Activities

2014 IPC Activity No.	Title of Proposed Activity	Timeframe of Proposed Activity
1	Telemetry Analysis for Nesting Kemp's Ridley and Loggerhead Sea Turtles (2013) and Sea Turtle Data Management	January 2014
2	Integration of Sea Turtle Exposure and Injury Assessment	January 2014
3	Integration of Migratory Bird Exposure and Injury Assessment	January 2014
4	2014 Addendum: Assessment of Jean Lafitte National Historic Park and Preserve (JELA) Submerged Aquatic Vegetation	Fall 2014
5	2014 Addendum: Assessing Recovery of Submerged Aquatic Vegetation Propeller Scars at Gulf Islands National Seashore	Fall 2014
6	Assessing Submerged Oil Mats by Remote Sensing Survey and Diver Characterization at Gulf Islands National Seashore	Fall 2014
7	Sand Beach Injury Assessment	CY2014
8	Response Information - Data Management, Infrastructure, Administration and Assessment	January 2014
9	Technical and Logistical Support for DOI's <i>Deepwater Horizon</i> Oil Spill NRDA	CY2014
10	Comprehensive Database for DOI-lead Studies, Analytical and Observation Data, Infrastructure and Administration	CY2014
11	Comprehensive Document Management System for Assessment & Restoration Planning Records Comprehensive Document Management System for DOI	CY2014
12	Comprehensive Document Management System for the Assessment Administrative Record	CY2014
13	Early Restoration Planning	CY2014
14	DOI Coordination, Oversight, Implementation and Analysis	CY2014