WORKSHEETS

"...except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act..."

– the Wilderness Act, 1964

GULF ISLANDS NATIONAL SEASHORE

Deepwater Horizon, Mississippi Canyon 252 Oil Spill Incident

May 2010

Please refer to the accompanying MRDG Instructions for filling out this guide. The spaces in the worksheets will expand as necessary as you enter your response.

Step 1: Determine if any administrative action is necessary.

Description: Briefly describe the situation that may prompt action.

An April 20, 2010 explosion at the Transocean, Ltd oil rig Deepwater Horizon has resulted in a major release of crude oil into marine waters off the coast of Louisiana. This incident (hereafter the “MS Canyon 252 Incident”) threatens to result in oil washing ashore at Gulf Islands National Seashore. Two of the islands potentially affected in the park are Horn Island and Petit Bois Island. Both of these islands are within congressionally designated wilderness.

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Oil is currently migrating toward the wilderness islands.

To determine if administrative action is necessary, answer the questions listed in A - F on the following pages.
A. Describe Options Outside of Wilderness

Is action necessary within wilderness?

Yes: ☑️ No: ☐

Explain: Yes. Oil may wash ashore within designated wilderness (i.e., above the mean high tide level). If it does, response actions will need to take place within wilderness to minimize damage to wilderness, as well as mitigate the potential for adverse affects to natural resources, including sensitive shoreline habitat and wildlife (shorebirds, wading birds and raptors) nesting and foraging areas.

B. Describe Valid Existing Rights or Special Provisions of Wilderness Legislation

Is action necessary to satisfy valid existing rights or a special provision in wilderness legislation (the Wilderness Act of 1964 or subsequent wilderness laws) that allows consideration of the Section 4(c) prohibited uses? Cite law and section.

Yes: ☐ No: ☑️ Not Applicable: ☐

Explain:

C. Describe Requirements of Other Legislation

Is action necessary to meet the requirements of other laws?

Yes: ☑️ No: ☐ Not Applicable: ☐

Explain: Action may be necessary to prevent or minimize harm to species listed under the Endangered Species Act. In addition, the Clean Water Act indicates that Federal government may act to mitigate damages resulting from a major oil spill. Such actions are currently underway throughout the region.

D. Describe Other Guidance

Is action necessary to conform to direction contained in agency policy, unit and wilderness management plans, species recovery plans, or agreements with tribal, state and local governments or other federal agencies?

Yes: ☑️ No: ☐ Not Applicable: ☐

Explain: Action is necessary to prevent impairment of park resources, including the wilderness resource.

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E. Wilderness Character

Is action necessary to preserve one or more of the qualities of wilderness character including: untrammeled, undeveloped, natural, outstanding opportunities for solitude or a primitive and unconfined type of recreation, or unique components that reflect the character of this wilderness area?

Untrammeled: Yes: □ No: □X Not Applicable: □

Explain:

Undeveloped: Yes: □ No: □X Not Applicable: □

Explain:

Natural: Yes: □X No: □ Not Applicable: □

Explain: Action is necessary to prevent oil from disrupting natural processes and causing wildlife injury or mortality.

Outstanding opportunities for solitude or a primitive and unconfined type of recreation:

Yes: □ No: □X Not Applicable: □

Explain:

Other unique components that reflect the character of this wilderness:

Yes: □X No: □ Not Applicable: □

Explain: Pristine white sand beaches are a major feature of this wilderness. This feature is directly threatened by the oil spill.

F. Describe Effects to the Public Purposes of Wilderness

Is action necessary to support one or more of the public purposes for wilderness (as stated in Section 4(b) of the Wilderness Act) of recreation, scenic, scientific, education, conservation, and historical use?

Recreation: Yes: □ No: X□ Not Applicable: □

Explain:

Scenic: Yes: X□ No: □ Not Applicable: □

Explain: Oil pollution on beaches and other parts of Horn and/or Petit Bois islands will have major adverse impacts on the scenic values of the Gulf Islands Wilderness.

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Scientific:  
Yes: X  
No:  
Not Applicable:  

Explain: Actions may be required to monitor the impacts of the spill on natural communities.

Education:  
Yes:  
No: X  
Not Applicable:  

Explain: 

Conservation:  
Yes: X  
No:  
Not Applicable:  

Explain: Actions may be necessary to conserve special status species by protecting them from the impacts of the oil spill.

Historical use:  
Yes:  
No: X  
Not Applicable:  

Explain: 

**Step 1 Decision:** Is any administrative action necessary in wilderness?

Yes: X  
No:  
More Information needed:  

Explain: Action in wilderness is critical to prevent, minimize, or mitigate damage to wilderness character resulting from oil-fouled beaches, inlets, wetlands, etc. Action is likewise necessary to prevent or mitigate damage to natural resources within the wilderness, such as vegetation communities, shorebirds, and shellfish.

If action is necessary, proceed to Step 2 to determine the minimum activity.
Step 2: Determine the **minimum** activity.

Please refer to the accompanying MRDG *Instructions* for an explanation of the effects criteria displayed below.

Description of Alternatives

For each alternative, describe what methods and techniques will be used, when the activity will take place, where the activity will take place, what mitigation measures are necessary, and the general effects to the wilderness resource and character.

<table>
<thead>
<tr>
<th>Alternative #</th>
<th>A</th>
</tr>
</thead>
</table>

**Description:**

Under this alternative, responders would be staged on barges or boats offshore from the wilderness. As needed responders would be transported to Horn and/or Petit Bois Island by boat to remove or otherwise respond to oil pollution on the beach and tidal areas. Response teams would walk while on the island to reach areas to be treated. Treatment would take place solely using hand tools such as shovels and rakes. Containment structures (e.g., booms) would be used, but would be located offshore, outside of the wilderness.

**Effects:**

- **Wilderness Character**
  - "Untrammeled"
  Wilderness would remain untrammeled
  - "Undeveloped"
  Wilderness would remain undeveloped because no permanent structures would be built
  - "Natural"
  wilderness would possibly lose some of its natural character under this alternative because response would be slow and limited in geographic extent, thus increasing the likelihood of resource damage and the area of its extent.

  "Outstanding opportunities for solitude or a primitive and unconfined type of recreation"

  N/A

  Other unique components that reflect the character of this wilderness

Only limited areas of white sand beach could be treated under this alternative.

**Heritage and Cultural Resources**

N/A

- Maintaining Traditional Skills

N/A

- Special Provisions

N/A

**Economic and Time Constraints**

The Deepwater Horizon, Mississippi Canyon 252 incident is an emergency and requires rapid response over a wide area. This alternative is most consistent with Section 4 of the Wilderness Act but does not

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provide for rapid response over a wide area (should this become necessary) because responders would be on foot and would only use hand tools.

Additional Wilderness-specific Comparison Criteria

N/A

Safety of Visitors, Personnel, and Contractors

This alternative provides the most safety for visitors, personnel, and contractors by eliminating the possibility of injury from machinery or land vehicles.

Alternative # _B_

Description:

Under this alternative, responders would be staged on barges or boats offshore from the wilderness. As needed responders would be transported to Ship and/or Petit Bois Island by boat to remove or otherwise respond to oil pollution on the beach and tidal areas. A step-up approach would be used for the response. At first, response teams would walk while on the island to reach areas to be treated. Treatment would take place solely using hand tools such as shovels and rakes. If this approach were not adequate, responders could use vehicles (ATVs, UTVs, etc.) to monitor impacts to the islands and to travel to areas needing to be treated, using hand tools upon arrival. If hand tools were not adequate, upon consultation with and subsequent approval by NPS, GUIS Acting Superintendent, other mechanical tools or light machinery may be used to collect and remove petroleum. If light machinery were not adequate to prevent or minimize resource damage, bobcats and heavy machinery may be used, if approved in advance by line official/authority identified above.

Containment structures (e.g., booms) would be used, but would be located off-shore, outside of the wilderness. Helicopters would be used to monitor the track of the spill and would land on wilderness beaches. Helicopters would not be allowed to land in or behind the dune area. All helicopter landings and/or over-flights occurring over Horn and Petit Bois Islands will be documented and subsequently reported through appropriate NPS Incident Command channels.

Effects:

Wilderness Character

"Untrammeled"
Wilderness would remain largely untrammeled, but greater manipulation would occur if it becomes necessary to use heavy machinery

"Undeveloped"
Wilderness would remain undeveloped because no permanent structures would be built

"Natural"
Wilderness would possibly lose some of its natural character under this alternative because of petroleum damage. However, if the amount of oil stranding on the islands is large, this alternative would result in less damage than Alternative A because the necessary response actions could be made faster and over a wider area.

"Outstanding opportunities for solitude or a primitive and unconfined type of recreation"
Greater adverse impacts than under Alternative A because of the use of helicopters and other machinery.

Other unique components that reflect the character of this wilderness

If necessary, more areas of white sand beach could be treated under this alternative than under Alternative A.

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Heritage and Cultural Resources

N/A

Maintaining Traditional Skills

N/A

Special Provisions

N/A

Economic and Time Constraints

The Deepwater Horizon, Mississippi Canyon 252 Incident, is an emergency and requires rapid response over a wide area. This alternative is less consistent with Section 4 of the Wilderness Act than Alternative A, but provides for more rapid response over a wider area should this become necessary.

Additional Wilderness-specific Comparison Criteria

N/A

Safety of Visitors, Personnel, and Contractors

This alternative provide less safety for visitors, personnel, and contractors because of the possibility of injury from machinery or land vehicles.

Comparison of Alternatives

It may be useful to compare each alternative's positive and negative effects to each of the criteria in tabular form, keeping in mind the law's mandate to "preserve wilderness character."

<table>
<thead>
<tr>
<th>Wilderness Character</th>
<th>Alternative A</th>
<th>Alternative B</th>
<th>Alternative C</th>
<th>No Action</th>
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</thead>
<tbody>
<tr>
<td>Untrammeled</td>
<td>+</td>
<td>-</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Undeveloped</td>
<td></td>
<td>+</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural</td>
<td>-</td>
<td>+</td>
<td></td>
<td></td>
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<tr>
<td>Solitude or Primitive Recreation</td>
<td>+</td>
<td>-</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unique components</td>
<td>-</td>
<td>+</td>
<td></td>
<td></td>
</tr>
</tbody>
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Safety Criterion

If safety issues override impacts to wilderness character or other criteria, provide documentation that the use of motorized equipment or other prohibited uses is necessary because to do otherwise would cause increased risks to workers or visitors that cannot be satisfactorily mitigated through training, use of personal protective equipment (PPE), or other requirements to alleviate the safety risk. (This documentation can take the form of agency accident-rate data tracking occurrences and severity; a project-specific job hazard analysis; research literature; or other specific agency guidelines.)

Documentation:
Step 2 Decision: What is the Minimum Activity?

Please refer to the accompanying MRDG Instructions before describing the selected alternative and describing the rationale for selection.

Selected alternative: Alternative B is the selected alternative.

Rationale for selecting this alternative (including documentation of safety criterion, if appropriate):

Alternative B consists of a step-up program that effectively includes Alternative A as its first line of response. If walking and hand tools are not adequate, the other actions and tools outlined in Alternative B can be used.

Monitoring and reporting requirements:

To the extent feasible, baseline information (particularly photographs) will be collected on Horn and Petit Bois islands to document “before” conditions. A report will be prepared after the incident documenting impacts to wilderness character both by the spill and by response actions.

Check any Wilderness Act Section 4(c) uses approved in this alternative:

X ☐  mechanical transport  X ☑  landing of aircraft
X ☐  motorized equipment  □  temporary road
X ☐  motor vehicles  □  structure or installation
X ☐  motorboats

Record and report any authorizations of Wilderness Act Section 4(c) uses according to agency procedures.

<table>
<thead>
<tr>
<th>Approvals</th>
<th>Signature</th>
<th>Name</th>
<th>Position</th>
<th>Date</th>
</tr>
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<tbody>
<tr>
<td>Prepared by:</td>
<td>[Signature]</td>
<td>Rick Clark</td>
<td>GUIS, Chief S&amp;RM/Agency Representative</td>
<td>5/18/10</td>
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<tr>
<td>Recommended:</td>
<td>☑️</td>
<td>Clay Jordan</td>
<td>GUIS Chief Ranger/Agency Representative</td>
<td>5/19/10</td>
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<tr>
<td>Recommended:</td>
<td>☑️</td>
<td>Dan Pontbriand</td>
<td>NPS, IMT-T2 Incident Command</td>
<td>5/18/10</td>
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<tr>
<td>Approved:</td>
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<td>Nina Kelson</td>
<td>GUIS Acting Superintendent</td>
<td>5/18/10</td>
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