

**UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
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March 31, 2003

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Information Bulletin No. OR-2003-118

To: District Managers: Eugene, Medford, and Salem

From: Deputy State Director for Resource Planning, Use and Protection

Subject: Integrated Pest Management for Bureau of Land Management Seed Orchards in Western Oregon

The Bureau of Land Management (BLM) has allocated specific lands in the Eugene, Medford, and Salem Districts for use as seed orchards. This allocation and establishment of the orchards preceded the completion of the current Resource Management Plans in each of the Districts. These plans recognized, reauthorized, and anticipated the continued use of these lands for seed orchard activities.

In 2001, a decision was made to pursue completion of Environmental Impact Statements (EISs) to address integrated pest management (IPM) for BLM seed orchards in western Oregon. The anticipated IPM plans are activity-level plan/EISs designed to analyze and consider site-specific alternatives for pest management in the seed orchards. The benefits of pursuing this course of action include:

- 1) A comprehensive analysis of various pest management alternatives, including use of chemical pesticides, supported by risk assessments and analysis presented in a document available for public review.
- 2) Analysis to support selection of a pest management program at each seed orchard (in a Record of Decision).
- 3) Elimination of the need to analyze each use of chemicals for pest management in separate Environmental Assessments (EAs).
- 4) More effective ability to address cumulative effects of an IPM program involving multiple actions over multiple years.

Following completion of the IPM EISs for the seed orchards and selection of an IPM program in the Record of Decision, EAs to complete actions outlined in the selected action will not be necessary. However, this does not release the Seed Orchard Managers and District Managers from documenting for the record that the intended IPM treatment is actually one of the activities analyzed by the IPM EIS and selected in the Record of Decision. Washington Office Instruction Memorandum No. 2001-062 provides a *Documentation of Land Use Plan Conformance Statement and NEPA (National Environmental Policy Act) Adequacy (DNA)* worksheet and further instructions. The Instruction Memorandum also specifically states that, "The signed

conclusion in the worksheet is an interim step in BLM's internal analysis process and does not constitute an appealable decision." For practical purposes, a series of IPM activities could be combined in a single DNA, for example annually. The intent of DNAs is not to be burdensome but to confirm in the official record that actions are occurring as analyzed in the applicable environmental and decision documents.

Preparation of EAs and EISs may be required to address unforeseen projects and circumstances at the orchard. For example, orchard expansion to land not currently within the orchard boundary, construction of new facilities, land clearing (not orchard recycling), new IPM technologies, and catastrophic events (flood, wildfire, landslide, volcano, etc.) would require additional NEPA documentation.

Many activities at the seed orchards are not specifically IPM related and do not vary by the alternatives examined in the IPM EISs. Examples of these ongoing orchard activities include facilities and road maintenance, mowing, pruning, tree planting, and other land cultivation and silvicultural activities. Generally, these activities are categorically excluded (516 DM 6, Appendix 5.4 C(1)), unless an exception applies (516 DM 2, Appendix 2). Periodic review and evaluation of these routine activities may be appropriate to determine if the Categorical Exclusion (CX) remains in effect and no exceptions apply. The Seed Orchard Manager and District Manager may wish to document this evaluation annually by preparing a CX. However, these routine activities could be evaluated every five-to-ten years. The level and frequency of evaluation and documentation is the discretion of the Seed Orchard Manager and District Manager.

As the districts prepare to publish the draft IPM EISs, this information is intended to clarify uncertainty about the utility and implementation of decisions that are anticipated to result from this ongoing process. Any additional questions should be addressed to Jeannette Griese, Contracting Officer's Representative for the Seed Orchard EISs (503-808-6182), or Leslie Frewing-Runyon, Western Oregon Planner (503-808-6088).

Districts with Unions are reminded to notify their unions of this Information Bulletin and satisfy any bargaining obligations before implementation. Your servicing Human Resources Office or Labor Relations Specialist can provide you assistance in this matter.

Signed by
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(Acting)

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