# United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Anchorage Field Office
4700 BLM Road
Anchorage, Alaska 99507-2591
http://www.blm.gov/ak

**ENERGY POLICY ACT OF 2005**
**CATEGORICAL EXCLUSION (CX)**

## A. BACKGROUND

**Project Name / Type:** Permit to Drill (Oil Well)

**NEPA Register Number:** DOI-BLM-AK-A010-2013-0023-CX

**Case File Number:** AKA028384

**Location / Legal Description:** Section 15, T. 8N., R. 9W., Seward Meridian, Kenai National Wildlife Refuge, Kenai Peninsula Borough, Alaska.

The surface is managed by the U.S. Fish and Wildlife Service. Mineral ownership is Federal government and managed by the Bureau of Land Management.

**Applicant:** Hilcorp Alaska LLC

**Description of Proposed Action:**

Hilcorp Alaska, LLC proposes to drill a new oil well, SRU 22-22, in the Swanson River Unit. The well will be drilled on existing Pad 34-15, which is located on Federal lease A028384. The anticipated start date for drilling is May 30, 2013. There is an existing gas well, SRU 234-15, on this pad that has been shut in since November 2001. An additional new oil well on this pad, SRU 24-15, was permitted and approved on February 14, 2013. Drilling for the SRU 24-15 oil well has been completed and it is currently in completion stage.

The proposed surface location for SRU 22-22 is 851 feet from the south line and 2,370 feet from the east line of Section 15, T. 8N., R 9W., Seward Meridian. The proposed vertical depth of the well is 11,376 feet with a measured depth of 12,021 feet.

The existing roads in the Swanson River Field as well as the main road leading into the field are suitable for transportation of the drilling rig and support equipment. Stockpiles of clean gravel will be used to level the pad if necessary.

A new 2” gas lift line and 3” flowline are currently being installed to connect the well to existing production facilities. A new heater will also be installed after completion of the well.

An existing water source will be utilized. The available source is from permitted water well located at TS 1-33. All water used will be tracked in compliance with applicable permits. Water will be transported via vacuum truck from the water well to the rig location.

Excess mud and cuttings will be hauled from the rig pit system or storage tanks to the Grind and Inject facility located on the Swanson River Pad 43-4. Waste will be disposed of in an approved disposal well, SCU 43-4WD.

Brines and completion fluids will be hauled to a permitted Class II disposal well in the Swanson River field for disposal.

All household and approved industrial garbage will be segregated and transported to the Kenai Borough Central Peninsula Landfill for disposal.

All sanitary waste will be contained on-site and hauled off-site by a designated contractor.

A trailer will be staged on the pad to house various supervisory personnel and a minimum number of support personnel. The remainder of the drilling crew will be housed at a temporary camp stage on Pad 212-27. The Doyon Arctic Fox rig will be used to drill this well.

Approval of the plan for reclamation will be obtained from the U.S. Fish and Wildlife prior to any reclamation work.

## B. LAND USE PLAN CONFORMANCE

**Applicable Land Use Plan:** Ring of Fire Approved Resource Management Plan and Record of Decision, March 2008

The proposed action is in conformance with plan because it is specifically provided for in the following planning decisions:

> **J. Minerals-Fluid Leasables, J-1: Goal** (page 12), which states:
> Maintain or enhance opportunity for mineral exploration and development while maintaining other resource values. Public lands and the Federal mineral estate will be made available for orderly and efficient exploration, development and production unless withdrawal or other administrative action is justified in the national interest.

The proposed action has also been determined to be consistent with potential environmental effects identified in the Final Revised Comprehensive Conservation Plan and Environmental Impact Statement for the Kenai National Wildlife Refuge, approved August 2009. This plan addresses management of existing oil and gas units, stating industry will operate under current State and Federal regulations and proceed diligently to avoid contamination and unnecessary surface disturbance.

## C. PLAN OF OPERATIONS

The proposal is designed in conformance with all bureau standards and incorporates best management practices and required and designed mitigation measures determined to reduce the effects on the environment.

## D. ENERGY POLICY ACT OF 2005 - CATEGORICAL EXCLUSION

The proposed activity has been determined to be statutorily categorically excluded from NEPA documentation in accordance with Section 390 of the National Energy Policy Act of 2005.

The applicable Categorical Exclusion reference in Section 390 of the Energy Policy Act of 2005 is exclusion number 2:

> *Drilling an oil and gas well at a location or well pad site at which drilling has occurred within five years prior to the date of spudding the well.*

## E. PERSONS AND AGENCIES CONSULTED

### Cultural Resources

The Alaska Heritage Resources Survey was consulted for cultural resources that could be affected by this undertaking. There is one known cultural resource within one mile of the proposed project: K.EN-0054, the Swanson River Unit #1 Discovery Well. It is not located on the same pad as the proposed well and will not be impacted by the Proposed Action. The proposed Area of Potential Effect (APE) is located in a disturbed area on an existing well pad that has been previously drilled. The Anchorage Field Office archaeologist determined that the potential for intact subsurface cultural resources is low.

Based upon previous disturbance in the oil field and previous archaeological reconnaissance of this area, it is Anchorage Field Office recommendation that, under the *BLM, Alaska State Protocol Agreement*, this Proposed Action will have no effect on historic properties. A stipulation regarding the discovery of previously unknown cultural resources will be included in the BLM authorization.

### Federally Threatened and Endangered Species

The impact of the Proposed Action on federally threatened and endangered plants and animals and their habitats has been evaluated in accordance with the Endangered Species Act of 1973, as amended. Based on currently available information, the Proposed Action will not affect any threatened or endangered species or their habitats. Therefore, no consultation with the U.S. Fish and Wildlife Service is necessary pursuant to Section 7 of the Act and none will be undertaken.

### Subsistence Resources

The Proposed Action occurs on Federal Public Lands as defined in ANILCA Section 102(3) and falls under the regulatory authority of the Federal Subsistence Board and Program. The area also

occurs within Game Management Unit 15A, which provides for Federal subsistence hunting opportunities for the residents of Cooper Landing, Ninilchik, Nanwalek, Port Graham, and Seldovia.

*Fisheries:*
The Proposed Action will not significantly reduce harvestable fisheries resources that are available for subsistence use. The Proposed Action will not alter the distribution, migration or location of harvestable fisheries resources. The Proposed Action will not create any legal or physical barriers that will limit access by subsistence users of the fisheries resource.

*Wildlife:*
The Proposed Action is within a previously disturbed area and will not alter the distribution, migration or location of harvestable wildlife resources. The Proposed Action will not create any legal or physical barriers that will 1imit subsistence harvest and access. The impacts to subsistence resources associated with this action will be negligible. The Proposed Action should not significantly alter the distribution, migration or location of harvestable wildlife resources.

*Other Resources:*
The Proposed Action will not appreciably impact any other harvestable renewable resources such as wood, berries, vegetation or water.

*Finding:*
This Proposed Action will not significantly restrict subsistence uses. As a result of the Proposed Action, there are no reasonably foreseeable significant decreases in the abundance or distributions of subsistence resources and no reasonably foreseeable limitation to subsistence access.

## F. DECISION AND RATIONALE

I have reviewed the proposal to ensure that the appropriate Categorical Exclusion, as described in Section 390 of the Energy Policy Act of 2005, has been correctly applied. Oil and gas exploration and development is analyzed in the Ring of Fire Resource Management Plan and the Comprehensive Conservation Plan and Environmental Impact Statement for the Kenai National Wildlife Refuge. It is my determination that no further environmental analysis is required.

Therefore, I have decided to implement Hilcorp Alaska's Application for Permit to Drill a new oil well in the Swanson River Unit with the following Conditions of Approval:

1. The operator must comply with all Required Operating Procedures, terms and conditions, and stipulations outlined in the Ring of Fire Approved Resource Management Plan and Record of Decision and the Comprehensive Conservation Plan and Environmental Impact Statement for the Kenai National Wildlife Refuge.

2. The operator should make all reasonable efforts to comply with the 2010 Alaska BLM Invasive Species Management Policy (attached). Specific measures recommended to be taken by the permittee include, but are not limited to, the following:

a. Proponent will thoroughly clean all drilling and transport equipment and gear prior to transporting to the authorized site of operations. Cleaning will involve high-pressure washing to remove mud, dirt, and plant parts. (This practice is the most effective and easiest method to prevent the inadvertent introduction and spread of non-native invasive species to otherwise weed free environments.)

b. Proponent will conduct an on-the-ground non-native invasive plant survey in the project area during the summer growing season (July/August), and annually thereafter for the life of the project, utilizing a professional botanist. Non-native plant survey data will be incorporated into the proponent's monitoring and management plan which will be updated annually for effective mitigation and management. Known existing non-native invasive species data can be found at http://akweeds.uaa.alaska.edu/, and http://www.eddmaps.org/alaska/.

   Proponent will develop and implement a monitoring and management plan for non-native invasive species prevention and management in the full operational footprint: pad, road, and any other infrastructure associated with this action.* This plan will describe actions to:

   - Prevent the introduction of new non-native plants in the project area,
   - Prevent the spread of any existing non-native plant species in the project area,
   - Reduce and eradicate any existing non-native plants in the project area,
   - Promote site reclamation with indigenous plant species.

   **Proponent has the option to pass funds to the Kenai National Wildlife Refuge for writing and implementing a monitoring and management plan for non-native invasive species.*

3. Upon approval of the Permit to Drill, the proposed well must be spudded and/or completed within two (2) years of the Application for Permit to Drill approval date or the permit will expire and will not be extended without further NEPA analysis.

4. Any cultural and/or paleontological resource (historic or prehistoric site or object) discovered by the leaseholder, or any person working on his behalf, on public or Federal land shall be immediately reported to the authorized officer. The leaseholder shall suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the authorized officer.

The above Conditions of Approval and terms and conditions provide justification for this decision and may not be segregated from project implementation without further NEPA review. In addition, I have reviewed the plan conformance statement and have determined that the proposed activity is in conformance with the applicable land use plan.

/s/ Alan Bittner May 3, 2013

Alan Bittner Date
Anchorage Field Manager

**Attachments**

1. Maps of proposed drill site
2. 2010 BLM Alaska Invasive Species Management Policy

**Administrative Review or Appeal Opportunities**

Under the Bureau of Land Management's regulations addressed in 43 CFR § 3165, the decision to approve this permit to drill is subject to appeal and administrative review. An administrative review must be conducted in accordance with 43 CFR § 3165.3 and must take place prior to pursuing an appeal to the Interior Board of Land Appeals.

Any adversely affected party may request an administrative review, before the State Director, either with or without oral presentation. Such a request must include information required under 43 CFR § 3165.3(b) (State Director Review), including all supporting documentation. Such a request must be filed in writing to the State Director, Bureau of Land Management, 222 West 7th Avenue, #13, Anchorage, AK, 99513 no later than 20 business days from the date this Decision Record is received or considered to have been received.

Upon request and showing of good cause, an extension for submitting supporting/additional data may be granted by the State Director.

Any party who is adversely affected by the State Director's decision, may appeal that decision to the Interior Board of Land Appeals in accordance with 43 CFR § 3165.4.

**Contact Person**

For additional information concerning this decision, contact:

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U.S. Department of the Interior

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# BLM - Alaska Invasive Species Management

2010

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## Purpose.

This document establishes BLM-Alaska policy concerning the coordination and management of invasive species actions on public lands within the State. This includes other resource management activities of the BLM, other organizations and individuals and their actions on public lands. Based primarily on the BLM Manual 9015 - Integrated Weed Management, this document is in furtherance of BLM responsibilities mandated by the legislation identified below in Authority and the BLM manual sections and other guidance, listed under the Reference section below.

The primary goal is to protect the environment with effective prevention, management and treatment strategies of invasive species that cross-cut most functional areas.

## Objectives.

A. Integrate invasive species prevention, detection and control activities into all on-the-ground activities conducted on BLM administered land in the State;

B. Provide guidelines for consistent management and reporting of invasive species occurrences, treatment and monitoring activities;

C. Ensure compliance with applicable federal and state laws, Executive Orders, regulations and policy;

D. Encourage development of cooperative relationships with adjacent landowners, state and local governments and agencies, to prevent and control noxious and invasive species. Maintain these relationships for the benefit of all parties involved; and

E. Protect the health and safety of those individuals involved with implementing the invasive species management program and for those certified to apply herbicides or pesticides.

## Authority.

A. Carlson-Foley Act of 1968 (PL 90-583). Directs agency heads to enter upon lands under their jurisdiction with noxious plants and destroy noxious plants growing there.

B. Federal Noxious Weed Act of 1974, as amended by Sec. 15, Management of Undesirable Plants on Federal Lands, 1990 (PL 93-629). "…cooperate with other federal and state agencies, and others in carrying out operations or measures to eradicate, suppress, control or prevent or retard the spread of any noxious weed".

C. Federal Land Policy and Management Act of 1976 (FLPMA). Directs the BLM to take any action necessary to prevent unnecessary and/or undue degradation of public lands and authorizes the BLM to enter into cooperative agreements.

D. Public Rangelands Improvement Act of 1978 (PRIA). Requires the BLM to manage, maintain, and improve the condition of the public rangelands, so that they become as productive as feasible.

E. Executive Order 13112, Invasive Species 1999. "…prevent the introduction of invasive species and provide for their control and to minimize economic, ecological and human health impacts that invasive species cause". Established the National Invasive Species Council (NISC) who developed the 2008–2012 National Invasive Species Management Plan (2008 Plan).

F. The Omnibus Consolidated Appropriations Act of 1997, Wyden Amendment (PL 104-208, Section 124), as amended (PL 105-277, Section 136.

G. Federal Seed Act of 1939 [7 USC 1551-1611].

H. Federal Plant Pest Act of 1957 [7 USC, Section 150aa-jj].

## Responsibility.

A. District Manager.

1. Protect and enhance the health of the public lands and environment through various means including the control of invasive species. Protect the health and safety of people involved with other aspects of implementing the invasive species management program on the ground;

2. Ensure that invasive species management activities are integrated into all BLM programs that may be affected by or cause the establishment or spread of undesirable species;

3. Allocate funding for district invasive species activities; and

4. Authorize or approve documents required to implement district invasive species management activities.

B. Field Managers.

1. Ensure that each field office has at least one individual to coordinate invasive species prevention and control activities in the FO Area with the appropriate biologist team, in conformance with existing laws and policies.

C. State Office Invasive Species Program Coordinator.

1. Responsible for planning and implementing a noxious and invasive species program utilizing appropriate integrated invasive species management techniques, in conformance with existing federal and state laws, Executive Orders, regulations and policy.

2. Coordinate with and secure from WO, state agencies and other partners the necessary approvals and authorizations, where required, and funding to implement the BLM-Alaska invasive species program;

3. Provide state-wide invasive species program guidance, including identification training, technical quality control, data management, RMP implementation tracking and monitoring;

4. Serve as the state noxious and invasive weeds database steward;

5. Assist the FO preparation of Pesticide Use Proposals and maintain state Pesticide Application Records;

6. Establish and maintain cooperative relations with internal and external groups;

7. Provide direction and mentoring for field office invasive species program contacts;

8. Coordinate and conduct training for BLM personnel;

9. Develop, coordinate and track invasive species portion of the AWP and assist in the Preparation of state budget submission; and

10. Analyze program trends and management implications of invasive species program, and communicate these to the District or Field Office coordinator or management team.

D. <u>District or Field Office Invasive Species Program Coordinator.</u>

1. Coordinate and implement District/Field Office invasive species prevention and management activities related to invasive species project proposals;

2. Monitor progress and ensure documentation of invasive species prevention and control activities;

3. Provide input for RMP's with clear goals for inventory and control of invasive species populations;

4. Provide input into NEPA and other documents (CEs, EAs, other activity management plans, etc.) on proposed projects, to identify those species likely to be present and problematic in or near the project area;

5. Conduct pre-project surveys and risk assessments to make recommendations for species prevention and treatments;

6. Work with the staff from other disciplines, including Fire and Operations, to enhance their understanding of invasive species issues and their ability to identify and report those species that are likely to be problematic;

7. Prepare or collect invasive species inventory reports, invasive control application reports, and daily logs from the field and invasive species treatments and forward the summary to the SO invasive species coordinator for inclusion in the State accomplishment reports; and

8. Ensure invasive species data is entered into the BLM National Invasive Species Management System (NISMS) database and in accordance with accepted standards and/or do so through AK Natural Heritage Program's (AK EPIC).

E. Project Leads – multiple discipline.

1. Ensure that invasive species concerns are addressed on vegetation altering or ground-disturbing projects;

2. Work with the District/Field Office Invasive Species Coordinator to conduct site-specific invasive species risk assessments and make site-specific recommendations for invasive species prevention and control; and

3. Ensure implementation of invasive species prevention and control methods and monitoring approved in a decision or other authorization.

F. NEPA and Planning Document Team Leads

1. Consider invasive species issues in NEPA and all planning documents, include prevention, EDRR, risk assessment results, recommendations or mitigation measures to prevent invasive species spread and to control invasive species infestations.

G. All Field-going Employees.

1. Attend invasive species training;

2. Report high-priority noxious weeds to one of the district/field invasive species coordinator;

3. Participate in EDRR control of high-priority invasive species and small outlier infestations; and

4. Consider invasive species prevention and mitigation measures in all vegetation altering or ground-disturbing activities.

## Reference.

A. Departmental Manual parts:

517- Pesticides
609- Weed Control
611- Forest Pest Control

B. BLM Manual Sections:

1740- Renewable Resource Improvement and Treatment
1742- Emergency Fire Rehabilitation
1745- Introduction, Transplant, Augmentation and Reestablishment of Fish, Wildlife and Plants
5800- Forest Protection and Forest Pest Management
9011- Chemical Pest Control
9014- Use of Biological Control Agents of Pests on Public Lands
9015- Integrated Weed Management
9220- Integrated Pest Management

C. Guidelines for Coordinated Management of Noxious Weeds: Development of Weed Management Areas (2002).

D. W.O. Instruction Memo No. 99-178, makes invasive species a part of the NEPA Critical Elements list (1999).

E. Partners Against Weeds, An Action Plan for the Bureau of Land Management (1996).

F. Thirteen Western States Vegetation Treatments EIS (1991).

G. Vegetation Treatments Using Herbicides on BLM lands in 17 Western States, PEIS 2007 and the Record of Decision in 2008.

H. Prioritization of invasive weed species may be assisted by the document, *Invasive Ranking System for Non-Native Plants of Alaska*, USDA R10-TP-143, August 2008.

I. 2008–2012 National Invasive Species Management Plan (2008 Plan) http://www.invasivespeciesinfo.gov/council/mp2008.pdf.

## Policy.

It is BLM-Alaska policy to effectively integrate invasive species prevention, control and management activities into all affected programs within all Field Offices. All employees must be responsible, in some part, for invasive species prevention, reporting and control. On all district and cooperative invasive species control projects, district personnel will explore all available techniques (manual, mechanical, cultural, biological and chemical) of integrated invasive species management (IWM), in determining invasive species control recommendations. Human safety, the environment, efficacy and economics will be considered in all proposed invasive species projects. The health of those individuals using herbicides will be protected by complying with all pertinent label instructions and BLM Manual requirements.

It is the policy of BLM-Alaska to use a variety of management approaches to achieve the objectives stated above. Preventive measures to be considered and included in permitted actions when practical are listed under *Appendix C: Annual Weed Prevention and Treatments*

*Schedule – BMPs.* In general, larger existing invasive species infestations will be treated either by contracted licensed applicators under the supervision of BLM Project Inspectors (District/Field Office invasive species coordinators), by Alaska Dept. of Agriculture (DOA) employees via the BLM State Office contract with DOA, the borough invasive species supervisors or their employees, and or staff/contractors from other official partners authorized to treat invasive species within the State identified on lands managed by the BLM.

## File and Records Maintenance.

Establish and maintain files in accordance with BLM manual Section 1270. Refer to BLM Manual section 1272 for guidance on records disposition. Invasive species data will be stored electronically in the NISMS (BLM National) and AKEPIC (Alaska Natural Heritage Program) databases.

## Management Priorities.

Management priorities will be based on invasive species characteristics, abundance, location and treatment history. These overlap and complicate management decisions.

- In areas that are not presently infested, with noxious or invasive species, place emphasis on preventing the spread of invasive species into those areas.
- In areas already infested, manage each species of invasive species based on priorities developed from invasive species and abundance, location and resource values threatened and treatment history. Prioritization of invasive weed species may be assisted by the document, *Invasive Ranking System for Non-Native Plants of Alaska*, USDA R10-TP-143, August 2008.

Priorities Based on Invasive species and Abundance.

A. Prevention. The District or Field Office will make reasonable efforts to prevent spread and establishment of noxious and invasive species in all areas. Follow approved post-project monitoring schedules to detect possible spread and control before invasive species become established. Apply prevention techniques on first, second and third priority invasive species. An Invasive species Prevention and Treatment Schedule (Appendix 1) will be updated by the invasive species team and approved by the district management team annually.

B. Early Detection and Rapid Response. The District or Field Office will make reasonable efforts to detect and eradicate new invaders and cooperate with adjacent landowners, agencies, state and local governments to accomplish this. Apply early detection and eradication to first and second priority invasive species and small outlier infestations of third priority invasive species.

C. Control of Established Infestations. The District or Field Office will cooperate with adjacent landowners, agencies, state and local governments, to control and contain established infestations. Manual and/or mechanical control will be the primary treatment on these infestations when feasible, although all control

measures will be considered. Control established infestations of third priority invasive species.

Priorities Based on Location and Resource Values Threatened.

A. Areas that are both relatively un-infested and at risk of invasive species establishment;

B. Areas with special resource values that would be degraded by persistence and expansion of infestations. Examples: Threatened or Endangered Species habitat, other Special Status Species habitat, Research Natural Areas, Areas of Critical Environmental Concern, Wilderness Study Areas, and Wild and Scenic River Corridors;

C. BLM administrative sites including recreation sites, community rock pits, gravel stockpiles, reservoirs, maintenance shops, warehouse yards, field stations, storage complexes, BLM owned and maintained roads, etc.;

D. Areas adjacent to private agricultural lands, major reservoirs, natural bodies of water, and perennial drainage ways;

E. Major rights-of-way including federal, state and county highways, powerlines and pipelines; and

F. Remaining affected public lands.

Priorities Based on Treatment History.

When prioritizing projects for treatment, new isolated sites in relatively invasive species free portions of the district are a priority. However, if invasive species abundance and location are similar, continue to re-treat sites that were previously treated, before moving to new sites where treatment has not been initiated.

## Invasive species Management Planning.

When formulating invasive species management plans, evaluate invasive species priorities and the management objectives for the site.

Consistency with Planning Documents.

Prevent and manage noxious and invasive species on district lands consistent with land management planning documents (RMPs, EAs, and EISs). Ideally, RMPs will set clearly defined goals for inventory and control that are quantifiable.

Environmental Analysis Process.

In conjunction with the environmental analysis process, assess all vegetation altering and ground-disturbing projects, to determine:

1) the risk of introducing or spreading noxious or invasive species,

2) the factors that favor spread and establishment of invasive species, and
3) the consequences of the spread and establishment of invasive species.

Environmental Controls and Objectives.

Ensure that project or action specific environmental controls and objectives are followed. Proposed invasive species projects will be reviewed to ensure compliance with applicable laws and regulations.

## Information and Reporting.

Data Collection and Storage.

District invasive species data will be collected according to the BLM district, state and national standards. Districts will develop district standards for invasive species reports from state and national standards. District standards will contain instructions for completing district paper or electronic forms. District forms will be designed to ensure consistent data collection. When the state or national office data standards change, districts will adapt their data collection and storage to meet the most current standards.

BLM-AK Districts should continue to work with the AKNHP AKEPIC database entry and with the national BLM NISMIS database system.

A. Database. Inventory, monitoring and treatment data will be stored in the standardized AKEPIC and NISMIS databases. District data may contain more than the minimum requirements established by these databases.

B. Geographic Information Systems (GIS). Invasive species inventory data will be incorporated into a GIS layer. The data will be consistent with the National Invasive Species Management Information System (NISIMS) set forth in IM No.WO-2007-159 and as setforth on the NISIMS website located at http://web.blm.gov/egis/nisims.htm.

C. Original Data. Original data will be stored by the District invasive species coordinator in central files or as designated by the district data/records administrator. If applicable, data will also be submitted in the Alaska Pesticide Use Proposals, Pesticide Application Reports, Biological Control Release Proposals and Biological Control Release Forms and other appropriate documents.

## Reporting Requirements.

District invasive species team members will report the acres treated, monitored or inventoried and invasive species outreach/education contacts made monthly. Report these actions by the correct Activity, Program Element and Project Code. Most any Activity Code can be used to fund invasive species projects. The district Invasive species Coordinator will be the district program element lead for program elements specific to invasive species accomplishments. If applicable, ensure that Pesticide Application Reports (PARs) are properly completed. Other district employees authorized to spray will submit their PARS to the invasive species team at least weekly.

## District Invasive Species Classification System.

Invasive Species Lists. Districts and Field Offices will use State and internal invasive species lists to develop priorities from individual species characteristics and abundance. Districts will cooperate with the Alaska Departments of Natural Resources, appropriate Boroughs within the district, and other Federal and State land management agencies in keeping invasive species list(s) current. To avoid confusion with the State and various other Borough or agency invasive species control policies, the management priorities listed below deviate somewhat from those listed in BLM Manual 9015; however, they are consistent with the intent of 9015. The district invasive species coordinator will maintain and update a prioritized list of invasive species known on district lands.

## Priorities by Species and Abundance.

A. First Priority. "First priority" designated invasive species are noxious invasive species that are not known to occur or occur in small infestations within the district or are unknown or uncommon in Alaska. These are the "Noxious" ("A") list invasive species from the Alaska Department of Agriculture (ADA). These species are the highest priority for control. Management emphasis is prevention, early detection and eradication via rapid response.

   Districts will discuss with ADA the need to list any new invasive species found within the district not on an existing "A" list in order for the BLM to implement treatment strategies.

B. Second Priority. "Second priority" designated invasive species are noxious invasive species that are not known to occur or occur in small infestations within the district, but are common in other regions of Alaska. In general, these could be on both the state "restricted seed" list ("B") and the "A" lists. These invasive species are the second highest priority for control and the highest priority for funding. Management emphasis is prevention, early detection of infestations and eradication. If an established infestation is detected, contain the infestation, decrease the infestation size and eventually eradicate the infestation when resources are available.

C. Third Priority. "Third priority" designated invasive species are widespread and well-established noxious invasive species and other invasive species of concern. This group is still a priority, but is generally a lesser priority for funding than those above. Management emphasis is to contain infestations and prevent the infestations from spreading, or when feasible, decrease the infestation size. More active control measures is implemented when feasible and at high-priority sites.

## Invasive species Risk Assessments.

A site-specific invasive species risk assessment will be made for all proposed actions within Districts that may introduce or spread invasive species. The risk assessment will provide such information as invasive species present or in the immediate area, the

potential for spread of these species or the establishment of additional invasive species, review project design features, as well as provide mitigation and monitoring recommendations for the proposed project. The purpose of the risk assessment and recommendations is to reduce the probability of invasive species establishment. (See Invasive Species Management Planning above). Prioritization of invasive weed species may be assisted by the document, *Invasive Ranking System for Non-Native Plants of Alaska*, USDA R10-TP-143, August 2008.

## Training and Education.

Ensure Agency Proficiency. All field going employees are encouraged to attend periodic training in the basic concepts and principles of invasive species identification, prevention and control. All district invasive species team members and those other district employees authorized to use herbicides will maintain their BLM Pesticides Certification. This requires attending the BLM 9000-01 IPM course every three years.

Public Outreach. Districts will participate in public education to improve or increase public awareness of invasive species issues, problems, impacts and solutions. Districts will participate in distributing educational materials to the general public. As much as possible, this effort will be done in cooperation with the Cooperative Weed Management Areas (CWMAs), state and local governments and other partners such as AKCANWIN, etc. Additional participation should be included in National Invasive Awareness Week, Alaska Invasive Weeds Awareness Week, and multiple partnership invasive species eradication efforts (weed pulls, etc.).

## Cooperation.

Internal Cooperation. Invasive species team members will work with program and project leads to integrate invasive species prevention, reporting and control in vegetation altering and ground-disturbing projects. A specific section related to invasive species should be included in activity related documents that consist of but are not limited to:

- Mining permits
- Road construction
- Campground, boat launch or other recreation area construction or expansion
- Fire suppression
- Any reclamation activity related to facility abandonment, abandoned mines, etc.
- Any other ground disturbing activity

External Cooperation. Districts has several cooperative agreements and Memorandum of Understandings (MOUs) with State and local agencies and other Non-Governmental Organization (NGO) partnerships to coordinate the management and treatment of noxious and invasive species. These cooperative efforts include public outreach and education. Emphasis for developing agreements is on priority invasive species, high-priority sites and cooperative control projects. Cooperation

with other agencies and landowners is encouraged. Any transfers of funds will be in compliance with all regulations; usually via specific Task Orders or formal Assistance Agreements through the BLM-Alaska State Office depending on the funding amounts involved.

Cooperative Agreements.

A. Statewide. Districts will coordinate integrated pest management with the Alaska Department of Agriculture, other Federal agencies, and/or boroughs in accordance with any existing or proposed contracts or agreements. Districts will forward this information to the State Invasive Species Program Coordinator at the State Office.

B. District-wide. Districts will cooperate with adjacent landowners, boroughs, state and other federal agencies, CWMAs and various NGOs through various agreements.

Provide leadership within the community. Districts will strive to provide leadership in developing partnerships with other agencies, landowners, and state and local government. Examples of cooperative efforts are in the following areas:

A. Formulate and implement IWM prescriptions, Best Management Practices (BMPs) and mitigation measures.

B. Educate and provide outreach to cooperators and the general public about noxious and invasive species locations, control and monitoring efforts.

## Glossary of Terms

-B-

Best Management Practices (BMPs): those control or management actions or techniques usually considered the best or most appropriate to use depending on the circumstances.

biological control: the use of live organisms to control a pest species. Biological control reduces the spread of an infestation by reducing weed vigor and seed production.

-C-

certified: as determined by the State of Alaska DNR, " 'certified,' as applied to bulblets, tuber, or horticultural plants or to agricultural, vegetable, tree, shrub, flower, or cereal grain seed, means inspected and labeled by and in accordance with the standards and rules and regulations of the official certification agency or in accordance with similar standards established by a similar authority in another state, country, or territory". Can be applied to 'certified' weed-free seed or 'certified' weed free straw/mulch. Always applies to the certification for the absence of noxious weed (seed or reproductive parts) and can be applied to other species ("certified foxtail barley-free") as requested.

chemical control: the use of herbicides to kill or reduce the vigor of undesirable plants.

control: reduction of a pest problem to the point that it causes no significant economic or ecologic damage. Control includes: eradicating, suppressing, reducing or managing invasive species populations, preventing spread. Can include taking steps to restore native species and habitats to reduce the effects of invasive species and prevent further invasions.

Cooperative Weed Management Area (CWMA): an official local organization formed by the local county or counties in cooperation with state and federal agencies and private land owners and NGOs. The purpose is to promote cooperation and coordinated weed management activities.

cultural control: the use of cultural practices, such as reseeding, competition, controlled grazing or shade retention, to reduce or kill undesirable plants. Cultural control techniques may overlap with biological and mechanical control techniques.

-E-

eradicate**:** complete elimination of all live plants, plant parts and seeds of a weed infestation from an area.

establishment: the point at which a new weed infestation is no longer in danger of dying out due to natural site conditions. In general an infestation of an annual weed is "established" when its seeds produce new plants (approximately one year) and a perennial weed "establishes" when the roots are securely developed (up to three years).

-I-

infestation: a population of an undesirable species.

invasive weed**:** a non-native plant species, whose introduction does or is likely to cause economic or environmental harm or harm to human health. These species may or may not have been designated as a "noxious weed" by the state or county.

Integrated Pest Management (IPM): is the consideration, evaluation, and use of alternatives available in resource management to prevent, eradicate, or mitigate invasive species and their impact.

Integrated Weed Management (IWM): the use of various techniques as one system to gain control of a weed species. Techniques include manual, mechanical, biological and chemical methods, to prevent or control problem plants.

-M-

manual control: the use of non-motorized hand tools or no tools to control weeds, such as: hand pulling, sawing, grubbing or digging.

mechanical control: the use of such techniques as: burning, mowing, power sawing or tilling to control weeds.

Memorandum of Understanding (MOU): Formal general agreement between the Bureau and other entities signing the MOU. An MOU does not obligate the Bureau to specific funding commitments such as an assistance agreement would.

-N-

new invader: an invasive plant that has recently moved into a particular area

NGO: Non-Governmental Organization.

noxious weed: a legal designation for non-native plants that are particularly aggressive, invasive and difficult to control. These have been designated by the Secretary of the Interior, State weed board and/or a borough or municipality weed board. Noxious weeds pose a threat to agriculture, recreation, wildlife, native plant communities, public health or other public or private property. Generally, noxious weeds will possess one or more of the characteristics of being non-native, aggressive and difficult to manage, parasitic, or a carrier or host of serious insects or disease.

P-

prohibited: an invasive plant that has recently moved into a particular area

-R-

restricted (species): State designated weed species occurring on a separate list that lists maximum allowable tolerances for those designated species in an effort at limiting the spread of objectionable species; typically into seed mixes. State of Alaska DNR definition, "Restricted noxious weed seed" means the seed of weeds which are very objectionable in fields, lawns, and gardens of this state, but which can be controlled by good cultural practices."

-W-

weed: an undesirable plant. “A plant out of place”, depending on management objectives.

Appendices

A. Alaska State Weed Statutes
B. Alaska State Prohibited seed, Alaska Administrative Code definitions (select)
C. Annual Weed Prevention and Treatments Schedule
D. IM 2006-73/Weed Free Seed Use on Public Lands Administered by the BLM
E. Herbicide Use by Designated Employees Policy Implementation

## Appendix A - STATE OF ALASKA PROHIBITED AND RESTRICTED NOXIOUS WEEDS

**Alaska Administrative Code 11 AAC 34.020**

**(A) The following are prohibited noxious weeds:**
Bindweed, field (*Convolvulus arvensis*);
Fieldcress, Austrian (*Rorippa austriaca*):
Galensoga (*Galensoga parviflora*);
Hempnettle (*Galeopsis tetrahit*);
Horsenettle (*Solanum carolinense*);
Knapweed, Russian (*Acroptilon repens*);
Lettuce, blue-flowering (*Lactuca pulchella*);
Quackgrass (*Elymus repens*);
Sowthistle, perennial (*Sonchus arvensis*);
Spurge, leafy (*Euphorbia esula*);
Thistle, Canada (*Cirsium arvense*); and
Whitetops and its varieties (*Cardaria draba, C. pubescens, Lapidium latifolium*).
Purple loosestrife (*Lythrum salicaria*)
Orange hawkweed (*Hieracium aurantiacum*)

**(B) The following are restricted noxious weeds, with their maximum allowable tolerances**:
Annual bluegrass (*Poa annua*), 90 seeds per pound;
Blue burr (*Lappula echinata*), 18 seeds per pound;
Mustard (*Brassica juncea, Sinapis arvensis*), 36 seeds per pound;
Oats, wild (*Avena fatua*), seven seeds per pound;
Plantain, buckhorn (*Plantago* sp.), 90 seeds per pound;
Radish (*Raphanus raphanistrum*), 27 seeds per pound;
Toadflax, yellow (*Linaria vulgaris*), one seed per pound;
Vetch, tufted (*Vicia cracca*), two seeds per pound; and
Wild Buckwheat (*Polygonum convolvulus*), two seeds per pound.
(In effect before 7/28/59; am 3/2/78, Reg. 65; am 10/28/83, Reg. 88)

Authority: AS 03.05 010
AS 03.05.030
AS 44.37.030
11AAC 34.020

## Appendix B - WEED SEED AS AGRICULTURAL SEED

**Alaska Administrative Code 11 AAC 34.030.**

The following seeds, when occurring incidentally in agricultural and vegetable seeds, are classed as weed seeds, except when sold alone or as a specific constituent of a definite seed mixture:

Black Medic (Medicago lupulina);

Cardoon (Cynara cardunculus);

Dandelion (Taraxacum species);

Lupine (Lupinus species);

Pigweed (Amaranthus species);

Radish (Raphanus sativus);

Rape (Brassica campestris and napus);

Sunflower (Helianthus annuus);

Yarrow (Achillea millefolium); and

Tufted Vetch (Vicia cracca).

**History: In effect before 7/28/59; am 3/2/78, Register 65; am 10/28/83, Register 88**

Authority: AS 03.05 010
AS 03.05.030
AS 44.37.030
11AAC 34.020

**Alaska Administrative Code 11 AAC 34.400**.
**Definitions** (select)

(5) "certified," as applied to bulblets, tuber, or horticultural plants or to agricultural, vegetable, tree, shrub, flower, or cereal grain seed, means inspected and labeled by and in accordance with the standards and rules and regulations of the official certification agency or in accordance with similar standards established by a similar authority in another state, country, or territory;

(13) "noxious weed" means any species of plants, either annual, biennial, or perennial, reproduced by seed, root, underground stem, or bulblet, which when established is or may become destructive and difficult to

control by ordinary means of cultivation or other farm practices; or seed of such weeds that is considered commercially inseparable from agricultural or vegetable seed;

(18) "pest" means a form of animal life, plant life, or infectious, transmissible, or contagious disease of plants, that is or is liable to be dangerous or detrimental to the agricultural industry of the state;

(19) "plant" means a whole or part of a plant, tree, shrub, vine, fruit, vegetable, seed, bulb, stolon, tuber, corm, pip, cutting, scion, bud, graft, or fruit pip, and includes an article made from a plant;

(20) "pure seed," "germination," and other seed labeling and testing terms in common use are defined as the terms are defined in the Rules for Seed Testing (Volume 6, #2, 1981) published by the Association of Official Seed Analysts, Stone Printing Company, Lansing, Michigan, and in the Federal Seed Act (7 U.S.C. 1551 et seq.) and the regulations promulgated under it (7 C.F.R. 201 et seq.);

(21) "restricted noxious weed seed" means the seed of weeds which are very objectionable in fields, lawns, and gardens of this state, but which can be controlled by good cultural practices; and

(25) "weed seed" means a restricted noxious weed seed and any seed not included in the definition of agricultural seed when it occurs incidentally in agricultural or vegetable seeds.

# Appendix C - Annual Weed Prevention and Treatments Schedule - BMPs

| **Prevention Activity** | **When** | **Who is Responsible** |
|---|---|---|
| Noxious weed training for all personnel. | Spring | District /State Weed Coordinator |
| Distribute public information, brochures & pamphlets. Post weed information at high use recreation sites such as campgrounds, boat launches, etc. | All Year | Weed Team, Reception, and Recreation Specialists |
| Conduct inventories for invasive weeds. Include weed inventories in all clearance surveys for proposed actions. | All Year | Weed Team, Botanists, Silviculture, Mineral Inspectors, or others as assigned. Contractors, miners, permittees |
| Report weed infestations when found. | All Year | All Field Personnel |
| Inspect gravel pits and fill sources to identify infestations. Require weed free gravel and fill to be used in weed free areas. | Spring/Summer | Weed Team, Botanists, Engineering staff, Road maintenance or other Personnel buying gravel and fill |
| Inspect recreation sites regularly for invasive weeds. Report infestations to District Weed Coordinator. | Spring/Summer | Recreation Specialists, Weed Team, Botanists, others as assigned |
| Maintain records of known invasive weed locations on district lands. | All Year | District /State Weed Coordinator and Weed Team |
| Include invasive weeds as an issue in all NEPA documents and plans covering projects where weeds may be present. | All Year | Project leads, EA Coordinators, Planners |
| Require contractors to power or pressure wash off-earth moving equipment to remove mud, dirt and plant parts before moving onto public lands and after working in infested areas, prior to moving to weed free areas. | All Year | Contracting Officers, Project Inspectors, Field Managers, Equipment Managers (Fire) |
| Power or pressure wash equipment to remove mud, dirt and plant parts after working in infested areas before moving to un-infested areas. | As Appropriate | Equipment Operators, Equipment Managers (Fire), Road Maintenance |
| Assure bucket or other water conveyance equipment (pumps, etc.) for fire suppression is sanitized prior to use in suppression efforts. | Seasonal | Equipment Managers, |
| Minimize soil disturbance, salvage vegetative mat and reseed where appropriate to reduce the likelihood of weed establishment. | All Year | Project Managers, Equipment Operators, Road Maintenance, Project Leads |
| Monitor projects sites to detect new infestations when risk of weed spread is moderate to high. | Summer | Project leads and others as assigned |
| Revegetate disturbed soil. Use native species. | Spring, Summer, Fall | Project Leads, Field Office Botanists |
| Use State certified “weed-free” seed in all revegetation projects. | Spring, Summer, Fall | Project Leads, Field Office Botanists |
| Use weed-free straw in all projects where straw is used. | All Year | Project Leads |
| Require all Mineral Operation Plans to include weed inventory, prevention, monitoring and control, and if present, submit eradication strategies. | All Year | Mineral Specialist |
| Retain bonds for weed control on all mineral activity until site is successfully revegetated when appropriate. | All Year | Mineral Specialist |
| Coordinate invasive weed control activities with other land owners, agencies, Conservation Districts and with the Alaska Department of Agriculture | All Year | District /State Weed Coordinator and other Weed Team members |
| Include invasive weed management in Transportation Management Plan | All Year | Road Manager, Lead Engineers |
| Implement invasive weed prevention strategies in all fire suppression, fuels reduction and rehabilitation efforts. | Summer | Resource Advisors |
| Survey and monitor areas of likely introduction of weed infestations, in burned areas on at regular intervals one to five years following a burn/fire. | Spring/Summer | Resource Advisors, District/State Weed Coordinator, Weeds Team, Fire Staff or others as assigned |
| Report suspected weed sites. Collect samples for identification. | All Year | All field-going employees |
| Control new small outlier infestations by hand or other methods as appropriate. | All Year | All field-going employees |

# APPENDIX D - IM 2006-73/Weed Free Seed Use on Public Lands Administered by the BLM

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240
January 20, 2006
In Reply Refer To:
1745 (220) P

EMS TRANSMISSION 01/27/2006
Instruction Memorandum No. 2006-073
Expires: 09/30/2007

To: All Field Officials

From: Director

Subject: Weed-Free Seed Use on Lands Administered by the Bureau of Land Management

Program Area: All programs which place seed, or approve the placement of seed on public lands.
Purpose: This Instruction Memorandum (IM) describes Bureau of Land Management (BLM) policy for the quality of seed purchased by BLM for use on public lands.

Background: The BLM Manual Section 1745 (1992) establishes policy and guidance for transplantation, augmentation, and reestablishment of habitat on public land utilizing native, and when necessary, introduced plant species. This action will comply with all Federal and State regulations, restrictions, and requirements governing the release and distribution of non-native exotic plants, including weed seeds.

BLM's Partners Against Weeds – An Action Plan for the Bureau of Land Management, January 1996, outlines BLM's plan to prevent and control the spread of noxious and invasive weeds on BLM lands. In addition, the 1999 Executive Order No. 13112 on Invasive Species states that each Federal agency shall not authorize, fund, or carry out actions that are likely to cause or promote the introduction or spread of invasive species in the United States.

The BLM obtains/purchases native or introduced plant seed, from seed producers and collectors for stabilization, rehabilitation, or restoration of public land. Prior to BLM accepting seed from any source, all seed must be tested for noxious weed seed at official state seed analysis labs. Noxious weed seed is not allowed in certified seed according to individual State's Department of Agriculture seed law and the Federal Seed Act. It has been acceptable for the seed lot (excluding species on the State and Federal noxious weed seed list) to contain from 0.5 percent to 2.0 percent of other "weed" seed depending on the State. "Other weed seed" is defined as any non-noxious weed seed, such as cheatgrass (downy brome) or Russian thistle, in the State(s) of concern. When purchased, all seed must also be of certified quality or source-identified.

Policy/Action: All Field Offices are required to use seed on public lands that contain no noxious weed seed and meets certified seed quality. All seed to be applied on public land must have a valid seed test, within one year of the acceptance date, from a seed analysis lab by a registered seed analyst (Association of Official Seed Analysts). The seed lab results shall show no more than 0.5 percent by weight of other weed seeds; and the seed lot shall contain no noxious, prohibited, or restricted weed seeds according to State seed laws in the respective State(s). The seed procured for use on public land will meet the Federal Seed Act criteria. Seed may contain up to 2.0 percent of "other crop seed" by weight which includes the seed of other agronomic crops and native plants; however, a lower percent of other crop seed is recommended. Copies of the seed lab test results, including purity and germination (viability) rate, must be forwarded to the appropriate BLM office prior to seed application. If the seed does not meet the BLM and State/Federal standard for noxious weed seed content or other crop seed allowances, it shall not be applied to public land. All seed test results must be retained in the seeding project file.

The BLM State contracts for seed may be more restrictive with "other weed seeds" of concern as deemed necessary.

All donated seed or seed used for “mitigation or restoration” by contractors per a reclamation plan must meet BLM’s noxious weed seed policy prior to use on public lands.

An exemption will be allowed for small reclamation projects, less than 20 acres or not to exceed 200 pounds of seed, which have an approved BLM reclamation or rehabilitation plan or permit. The seed will be accepted if accompanied by an official seed analysis report that provides documentation to show no noxious weed seed per State(s) weed law and no more than 0.5% other weed seeds. For this exception, any one of three seed test documents will be accepted:

1. A certified “blue” tag or tags.
2. An independent seed lab test.
3. A seed lab analysis supplied by a vendor either by seed lot or by seed mix.

Straw or mulches applied as part of seeding, stabilization, rehabilitation, or restoration projects on public lands must be certified to be weed seed-free.

Timeframe: Effective immediately.

Budget Impact: Approximately 80% of the seed used on public lands is purchased during a National Seed Buy (three times a year average) via a national seed contract. Under this contract, the seed must be tested prior to acceptance and payment. Therefore, there will be no new costs associated with the National Seed Buy. For offices and programs not currently testing their seed for noxious weeds or are approving project proponents to apply seed on public land without first testing for noxious weeds there will be a slight increase in the cost of seeding treatments. A typical seed test costs between $120-220 per lot for purity, germination, and noxious weed seed analysis.

Manual/Handbook Sections Affected: None.

Coordination: Coordination for this IM has been with WO-200, WO-220, WO-230, WO-270, WO-310, ID-930, BC-660.

Contact: If you have any questions on policy, please contact Jack Hamby, National ES&R Program Lead, at (202) 452-7747 or via email at Jack_Hamby@blm.gov. Questions pertaining to seed test, viability, seed lot tags, or weed seeds should be directed to Scott M. Lambert, National Seed Coordinator, Idaho State Office, at (208) 373-3894 or by e-mail Scott_Lambert@blm.gov.

Signed by:
Lawrence E. Benna
Acting, Director

Authenticated by:
Robert M. Williams
Policy and Records Group,WO-560

## Appendix E - Implementation of Herbicide Use by Designated Employees

**(It is anticipated that the use of herbicides will be implemented as an option into the BLM Alaska Integrated Pest Management actions as early as the next fiscal year**.)

1. All employees authorized to do herbicide treatments within the State will maintain their BLM Pesticides Applicator Certification, follow State requirements regarding PPE, comply with the State Weed Program Risk Management Worksheet "Control Measures" as identified, and those requirements specified in BLM Manuals 9011 and 9015. At least one member within a district will maintain an annual BLM Pesticide Applicator applicator's license. The BLM Pesticide Applicator Certification requires an initial 40 hour training with subsequent re-certification within every 3 years.

2. Herbicide use by employees will be limited to small weed sites outside of the larger infestations designated for treatment by contractors or BLM cooperators. Refer to the GIS Weed maps for specific locations intended for treatment via contractors, Conservation District or State weed program employees, ADOT, etc.

3. Herbicides will be handled, transported, and stored in compliance with the EPA label at all times.

4. Herbicide will be purchased in small off the shelf quantities to minimize storage concerns.

5. NO herbicides requiring respirators will be used within the district by BLM personnel as per district safety program policy.

6. Initial baseline blood testing will be required for all employees involved with herbicide use. This will include project inspectors on spray contracts as well as those employees authorized to spray. Periodic subsequent blood testing will be authorized on an annual basis, or longer intervals, if requested by the employee. Costs will be paid by SO funds through the Safety Program.

7. Where herbicides are to be stored, lockable pesticides storage units will be purchased and will be used for herbicides only.

8. PPE, travel container boxes, and other miscellaneous supplies will be acquired and periodically inspected and maintained and restocked as needed by the weeds team.

9. Regular close coordination between the weeds team members and other district employees authorized to use herbicides will be necessary for the most efficient, effective operation of the district invasive weed management program.