

MEMORANDUM FOR CONTRACTING OFFICER

SUBJECT: Within Scope Information for Contract No. F16PX02667 - National Environmental Policy Act Services for South Farallon Islands House Mouse Eradication Environmental Impact Statement

1. Description of Changed Work

- a. Identification of Change: *Changes were identified during the review of public comments on the Revised Draft EIS, review of other information, and interagency discussions. The need for contingency plans to be included in the Final EIS was noted in comments from the U.S. Environmental Protection Agency as well as a review of lessons learned from past projects and best management practices for rodent eradication projects. The need to include an assessment of potential impacts to Essential Fish Habitat, and consultation with NOAA-National Marine Fisheries Service (NMFS), was discovered in a discussion with NMFS regulatory staff. The need to apply for a Level A marine mammal take permit was realized during Core Team discussions of potential impacts to marine mammals from the project.*

The original contract Scope of Work described attendance to 10 all day meetings. In order to discuss responses to public comments, new information, changes to the EIS, and critical decisions related to the project, the contractor has reached the 10 meetings previously budgeted. Given that there is still a substantial amount of work to be done requiring additional Core Team meetings as well as meetings with environmental compliance agencies, we project the need for at least an additional 10 all day meetings for the contractor to attend.

To conduct these additional tasks, an extension to the period of performance is necessary. In addition, the Service has experienced a delay in its decision to identify a preferred alternative for the project while awaiting the results of a study. This is causing delays in completing the Final EIS and other associated environmental compliance (if any action alternative is chosen), furthering the need to extend the period of performance.

- b. Description of Change: *Changes will include: 1) assisting the Service with the development of contingency plans for both a) marine and terrestrial bait spills and b) unforeseen non-target impacts; and 2) conducting an assessment of impacts to Essential Fish Habitat, including consultation with NMFS. The estimated additional cost for these tasks is \$60,174.*
- c. Necessity for Change: *These changes are needed to assure that the Farallon House Mouse Eradication Plan Final EIS is a complete and legally defensible document and to assure that all required environmental compliance is completed. The potential impacts if not addressed include increased risk of lawsuits if we are found to be not in compliance with the law and established policies and failure to obtain required environmental compliance permits.*

2. Scope of Initial Procurement

The general scope as identified in the Scope of Work: "The Contractor shall assist the U.S. Fish and Wildlife Service (Service) in the preparation of a Final Environmental Impact Statement (EIS) and related environmental compliance documents for the proposed South Farallon Islands House Mouse Eradication. The Draft EIS was completed in 2013."

This award was solicited as best value, with a set aside for Total Small Business. Two quotes were received. The award amount was \$130,000.

3. Within Scope Determination

The changes requested are within the scope of the original contract because the additional tasks identified are needed to complete the South Farallon Islands House Mouse Eradication EIS. While these tasks are part of completing the EIS, they were not identified in the original SOW.