

Streamlined INRMP Updates

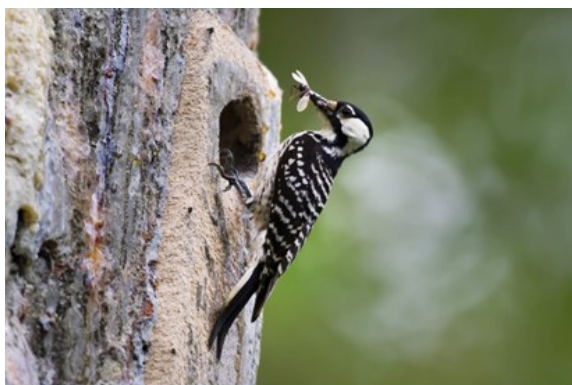
Background

Congress established the Sikes Act (16 U.S.C. 670a-670o) in 1960 to ensure that the U.S. Department of Defense (DoD) manages and protects fish and wildlife resources on its lands. Because military lands are often protected from human access and impact, they contain some of last remaining large tracts of increasingly rare habitat types. In 1997, Congress amended the Sikes Act to require DoD to develop and implement Integrated Natural Resources Management Plans (INRMPs) to ensure appropriate and sustainable management of the natural resources for which DoD has stewardship responsibility.

To reduce the effort involved in updating INRMPs, the U.S. Fish and Wildlife Service (USFWS) published *Guidelines for Coordination on INRMPs* (June 2015) and the Office of the Assistant Secretary of Defense for Energy, Installations, and Environment released *Guidelines for Streamlined Review of INRMP Updates* (July 2015). These documents describe a streamlined process for reviewing and updating existing INRMPs; they do *not* apply to either new INRMPs or to INRMPs that require revisions (i.e., significant changes). The goal of using a streamlined approach for updating INRMPs is to ensure INRMPs are current and sustain mission flexibility.

When to Update an INRMP

All installations must keep their INRMP current. It is DoD policy to review installation INRMPs annually. The Sikes Act requires that each INRMP must be reviewed for operation and effect by USFWS and the appropriate state agency at a minimum of once every five years.



Red-cockaded woodpecker (photo credit: USFWS)

Who Participates in an INRMP Update

Updating an INRMP is a collaborative process that involves coordination among staff from the installation, USFWS, and appropriate state agency. Early involvement and collaboration among all parties is crucial to ensuring INRMPs are reviewed, updated, and/or revised in a timely manner.

What to Include in an INRMP Update Package

An INRMP update should be clear and concise. The INRMP update package must include the following three components.

1. **Transmittal letter:** This is a cover letter to USFWS and the state agency that summarizes the proposed changes to the INRMP.
2. **Description:** This is an attachment that clearly describes the scope and location of all proposed changes to the INRMP. The attachment may be described in text, presented in a table or matrix, or presented in an alternate format acceptable to all parties.
3. **Track changes:** In addition, the INRMP with all changes indicated via Track Changes must be included in the package.



Partners discussing INRMP details at Dobbins Air Reserve Base (photo credit: Conserving Biodiversity on Military Lands)

How to Update an INRMP

1. Determine if the INRMP warrants an update or revision.
2. If the INRMP only needs an update, then notify and coordinate with USFWS and the appropriate state agency. This should happen as soon as possible, but no later than 30 days before submitting the draft for review.
3. Submit a **preliminary draft update** to the appropriate USFWS field and state agency offices.
4. USFWS and the state agency will provide comments within 30-60 days.
 - a. If this timeline is unattainable, the parties will work together to find an amenable alternate timeline.
 - b. If there is disagreement about the updates, the parties will work to find a resolution within the agreed upon review timeline.
 - c. If the installation does not hear back from the agencies within 60 days, then there is a presumption of concurrence, and the installation may finalize the update.
5. Incorporate comments from USFWS and the state agency and finalize the INRMP update.



6. Submit the **final draft** update to the USFWS field office, USFWS Regional Sikes Act Coordinator (list available [here](#)), and state agency.
7. USFWS and the state agency will respond and provide signature within 30-60 days.
 - a. If this timeline is unattainable, DoD and the USFWS Regional Sikes Act Coordinator will be notified within 10 days of receipt.
 - b. Then the USFWS Regional Sikes Act Coordinator will facilitate the signature process.
8. The USFWS field office will return the original concurrence letter or signature page to DoD, and provide a copy of it to both the USFWS Regional Sikes Act Coordinator and the state agency.
9. The INRMP update is now complete.



Hawaiian monk seal (photo credit: USFWS)

Definitions

***Compliant INRMP:** An INRMP that has been both approved in writing and reviewed within the past five years for operation and effect by authorized officials of DoD, USFWS, and the appropriate state agency.

***INRMP revision:** Required when any new natural resources management action necessitated by changes to the military mission, the condition of the land, or the status of the species present and not previously considered by the parties to the INRMP when the plan was last approved and/or reviewed as to operation and effect. Revised INRMPs require approval by all INRMP signature parties, and will usually require new or supplemental NEPA analysis.

***INRMP update:** Any change to an INRMP that, if implemented, is not expected to result in consequences materially different from those in the existing INRMP and analyzed in its existing NEPA document. As these changes will not result in significant environmental impacts, installations are not required to invite the public to review or comment on implementation of the updated INRMP.

****Operational INRMP:** A previously compliant INRMP that is currently being used to guide natural resources management on a given installation, irrespective of signature date or most recent review for operation and effect, and is considered functionally equivalent to a compliant INRMP provided that INRMP has previously been deemed compliant. The parties to the INRMP treat operational INRMPs as suitable instruments for providing the installation with applicable exemptions or exclusions from critical habitat designation as put forth under Section 4(a)(3)(B)(i) and Section 4(b)(2) of the Endangered Species Act, if USFWS and/or National Marine Fisheries Service (NMFS) determines, in writing, that the INRMP or an INRMP addendum provides a benefit to the species for which critical habitat is proposed for designation.

+Annual INRMP review: An informal review that the installation initiates with the USFWS field office, the appropriate state agency, and other partners (if necessary) to assess the focus areas that measure INRMP effectiveness and partnership success. The parties participating in the meeting record the outcomes in a memo, which is used to keep the INRMP current, the parties informed, and expedite reviews for operation and effect.

+Review for operation and effect: A comprehensive, joint review by the parties to the INRMP, conducted no less often than every five years, to determine whether the plan needs an update or revision to continue to adequately address Sikes Act purposes and requirements.

*As defined in the DoD Guidelines for Streamlined Review of INRMP Updates, July 2015

** As defined in the fiscal year 2020 Environmental Management Review Metrics

+ As defined in the USFWS Guidelines for Coordination on INRMPs, June 2015



Eastern indigo snake (photo credit: Roy King)

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November 2020