

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.

In June 2015, the U.S. Fish and Wildlife Service (USFWS) published *Guidelines for Coordination on Integrated Natural Resource Management Plans* and, in July 2015, the Office of the Assistant Secretary of Defense released *Guidelines for Streamlined INRMP Review*. Both documents clarify and 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 reduce the workload for all parties, ensure INRMPs are current, and sustain mission flexibility.

Definitions

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

***INRMP revision:** Any new natural resources management actions 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. All such revisions require approval by all parties to the INRMP, and will usually call for a 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 an existing NEPA document. Such changes

*As defined in the [DoD Guidelines for Streamlined INRMP Review, July 2015](#)

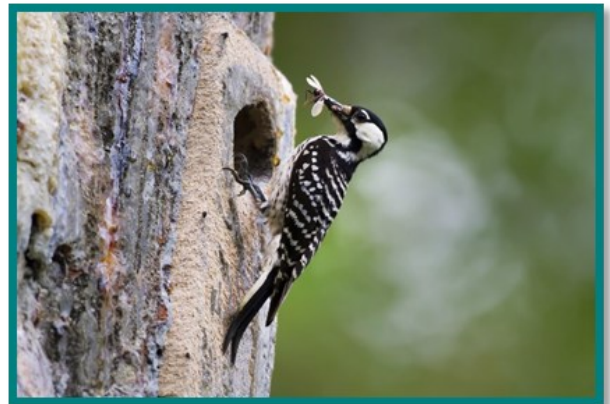
+As defined in the [USFWS Guidelines for Coordination on INRMPs, June 2015](#)

will not result in a significant environmental impact, and installations are not required to invite the public to review or to comment on the decision to continue implementing the updated INRMP.

***Operational INRMP:** The most recent version of an installation's INRMP that was reviewed for operation and effect. USFWS will consider that INRMP currently being used to guide natural resource management on a given installation, irrespective of signature date, to be the operational equivalent of a compliant INRMP.

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

+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.



Red-cockaded woodpecker (photo credit: USFWS)

When to Update an INRMP

All installations must keep their INRMP current. It is DoD policy to review 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.





Hawaiian monk seal (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. After the parties work together to create a draft updated INRMP, then the installation officially submits that draft to the appropriate USFWS and state agency offices. Once the draft is approved, then the installation submits the final update to the USFWS field office, USFWS Regional Sikes Act Coordinator, and state agency. A current list of the USFWS Regional Sikes Act Coordinators is available [here](#).

What to Include in an INRMP Update

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 packet.

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 USFWS and the appropriate state agency with whom you will coordinate. 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, and state agency.
7. USFWS and the state agency will respond and provide signature within 30-60 days.
 - a. If this timeline is unattainable, then that agency will notify DoD and the Regional Sikes Act Coordinator within 10 days.
 - b. The Regional Sikes Act Coordinator will then facilitate the review 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 Regional Sikes Act Coordinator and the state agency.
9. The INRMP update is now complete.

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