

INRMP COMPREHENSIVE STRATEGIC ACTION PLAN

Department of Defense, Fish and Wildlife
Service and International Association of Fish
and Wildlife Agencies

*Comprehensive Plan for Using Integrated Natural Resource
Management Plans at Active Military Installations and Ranges
to Sustain Readiness*

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PURPOSE

This *Comprehensive Plan for Using Integrated Natural Resource Management Plans at Active Military Installations and Ranges to Sustain Readiness* (Plan) describes a set of activities related to the implementation of INRMPs that will ensure the Department of Defense's (DoD or the Department's) ability to properly manage the valuable natural resources entrusted to its care and sustain the readiness of its force.

This Plan is designed to be living document. It will be updated and refined as it is coordinated throughout the Department and with the DoD natural resource stakeholder community.

BACKGROUND

Military installations and ranges are a foundation for the readiness of our military. These assets are used for training and testing purposes to thoroughly expose our troops to all of the realistic threats and tactics of war and to ensure that weapons systems are effective and safe. At the same time, most of these installations and ranges are ecologically significant. They provide habitat for a broad spectrum of rare, and federally listed threatened and endangered (T&E) plants and animals. Consequently, military installations and ranges are engaged in managing T&E species.

Two federal laws provide specific direction on certain aspects on how the DoD is to manage its natural resources at military ranges and installations. First, the Endangered Species Act (ESA), Section 7, requires DoD to consult with the Department of the Interior (Interior) when any activity authorized, funded or carried out by the Department may affect a listed species or designated critical habitat.

The second federal law, the Sikes Act, requires the Department carry out a program to provide for the conservation and rehabilitation of natural resources on military installations. The Sikes Act further requires DoD to prepare Integrated Natural Resource Management Plans (INRMPs) where appropriate. These plans are to be prepared in cooperation with Interior's Fish and Wildlife Service as well as the head of each relevant State fish and wildlife agency.

An INRMP is the primary tool used by DOD installations and ranges, where required, to identify those activities that are need to ensure the successful management of natural resources on the installation. By law they are required to provide for:

- Fish and wildlife management, land management, forest management and fish and wildlife-oriented recreation
- Fish and wildlife habitat enhancement or modifications
- Wetland protection, enhancement and restoration, where necessary for support of fish or wildlife
- Integration of, and consistency among, the various activities conducted under the plan
- Establishment of specific natural resource management objectives and time frames for proposed action
- Sustainable use by the public of natural resources to the extent such use is not inconsistent with the needs of fish and wildlife resources

- Public access to the military installation that is necessary for appropriate for the use described in the bullet above subject to requirements necessary to ensure safety and military security
- Enforcement of natural resource laws and regulations
- No net loss in the capability of military installations lands to support the military mission of the installation
- Conservation and rehabilitation of natural resources on military installations
- The sustainable multipurpose use of the resources including hunting, fishing trapping and non-consumptive uses

Preparation of INRMPs is required unless the Secretary of the military department determines that the absence of significant natural resources on a particular installation makes preparation of such a plan inappropriate. Approximately 380 DoD installations and ranges are required to prepare an INRMP.

The National Defense Authorization Act (NDAA) for Fiscal Year 2004 made important changes in the ESA regarding INRMPs. Under new Section 4(a)(3)(B)(i) of the ESA, the Secretary of Interior or the Secretary of Commerce, as appropriate, is precluded from designating critical habitat on any areas owned, controlled, or designated for use by the DOD where an INRMP has been developed that, as determined by the DOI or DOC Secretary, provides a benefit to the species subject to critical habitat designation.

The participation of the USFWS local field offices and appropriate State fish and wildlife agencies is crucial to the successful development and use of INRMPs to achieve mission readiness. These organizations have a statutory obligations to review and coordinate on INRMPs. More importantly, along with the installation fish and wildlife staff, they have the technical expertise to identify programs and projects that will ensure the viability of species and protection and restoration of critical habitat. Successful execution of INRMPs requires adequate attention to the proper resourcing of DoD, USFWS and State fish and wildlife programs to support the INRMPs process.

INRMPs and their implementation are likely to come under greater scrutiny due to the increased importance of INRMPs that resulted in the recent change in law. It is increasingly important that DoD, USFWS and the states are diligent in properly implementing the provisions of the Sikes Act and ESA, as well as following through on the commitments embodied in INRMPs, including the high priority conservation and mitigation strategies.

STRATEGIC GOALS

Well-developed and effectively implemented INRMPs will lead to fewer legislative restrictions being placed on DoD's natural resources. This will result in sustained ability to test and train, maintaining military readiness. The objectives and specific actions that are identified in this Plan to meet the strategic goals will be defined and refined throughout the development and ongoing update of this document.

Management of Natural Resource to Enhance Military Readiness

The recent implementation of the new legislative authority to allow INRMPs to substitute for critical habitat designation has provided important opportunities for DoD to use new or revised

INRMPs to prevent designation of critical habitat on military land where effective INRMPs are in place. Accordingly, DoD's natural resource management program should make use of this new authority where appropriate to provide more operational flexibility.

Responsible and Credible Implementation of New Authorities

The Executive Branch placed a high priority on obtaining a change to the ESA to permit DoD the flexibility to manage for listed species using INRMPs, rather than require the designation of critical habitat on military installations. Some non-governmental environmental organizations opposed this legislation (i.e., new ESA section 4(a)(3)(B)(i)), and have indicated they will monitor carefully the implementation of this new authority. As a consequence, installation commanders wishing to forestall critical habitat designation using this authority must ensure that the installation's approved INRMP now provides—or is revised to provide--the requisite benefit for any species proposed for designation, and that sufficient funding is sought and obtained to achieve the management goals and objectives specified in the plan within the time frames proposed for action. Failure to do so could open the door to crippling lawsuits and undermine the successful use of this authority.

Stakeholder Support for Strategy

Stakeholder support for DoD's INRMP strategy is important to the success of DoD's efforts to ensure the readiness of its forces. The actions of external stakeholders will help determine the success of these efforts. To the extent that they understand or perceive DoD to be transparent, responsible and trustworthy, they will allow DoD to move forward aggressively and effectively in undertaking actions to protect installations and ranges and the activities that take place on them over the long term.

INRMP OBJECTIVES AND TASKS

This section identifies specific objectives to achieve the goals or outcomes identified in the prior section. These objectives serve as a point of departure and may be refined and updated throughout the development of this Plan. Some objectives and specific actions will meet multiple strategic goals; others target only one goal.

Objective 1: Improve quality and consistency of INRMPs

1. Update DoD Guidance to facilitate consistent review of INRMPs. DoD will issue guidance to clarify the required INRMP review process for military installations; to outline the triggers and process for engaging the public in reviewing any required revisions; and to specify the process for consulting with USFWS and state fish and wildlife agency personnel to ensure the continued "mutual agreement" of the parties to the INRMP.

2. Issue/Finalize Policy and Guidance that will facilitate application of new authorities. The USFWS will prepare updated guidance, *Guidelines for Coordination with the DoD and Implementation of the Sikes Act*, in consultation with DoD and the IAWFA, to address criteria for substituting INRMPs for designations of critical habitat and requirements and procedures related to the 5 year review provisions of the Sikes Act. The guidance will also address responsibilities and procedures related to Sikes Act implementation, and creation of INRMP development and implementation teams.

3. *Clarify the roles, responsibilities and timelines of the various tri-partite organizations to enhance program effectiveness and timeliness of actions.* A new Memorandum of Understanding (MOU) between DoD, USFWS and International Association of Fish and Wildlife Agencies (IAFWA) will define the various roles and responsibilities of the various parties, formalize the DOD and USFWS Core Group as a forum for identifying issues related to INRMPs and resolving them, and to facilitate information exchange, data collection and studies.

4. *Develop New Metrics to assess progress towards improving the effectiveness of INRMPs in protecting and enhancing mission readiness.* DoD will improve and expand metrics to track implementation of its INRMPs. The existing metrics track accomplishments towards meeting the requirements to establish the initial INRMP and review existing INRMPs within 5 years, coordinate with all the appropriate parties, obtain public input on INRMPs, and ensure adequate funding for Class 0 and Class 1 projects. Additional metrics are being reviewed:

- INRMP effectiveness towards protecting and enhancing mission readiness (i.e., see Marine Corps guidance)
- General conservation metrics (i.e., from Charleston, SC meeting)
- Success of INRMPs at the species level (as opposed to the installation level)
- Three Section 318 criteria for benefiting species
- How well the INRMP team at the local level works together
- What will help commanders/leadership measure success?
- Supports other Federal, State and Regional missions (i.e. species recovery plans, conservation initiatives)
- Actions that result in the decision to not list a species as T&E
- Actions that result in decision to avoid designation of new critical habitat.

5. *Report metrics results in Annual Report.* To create incentives for meeting statutory review requirements for INRMPs and provide a process for identification of issues that may arise as a result of the metric reporting process, use the USFWS and DoD Annual Reports to report metrics results. Although results contained in the annual report could be based on quantitative data, display results in the report itself in more qualitative fashion (red, yellow, green coding).

6. *Develop an INRMP template.* To promote more efficient, timely and consistent review of INRMPs, DoD will develop an INRMP template. While standardized in many ways, the template should incorporate some degree of flexibility to accommodate installation specific needs. The template should link to the comprehensive range management plans where such plans are required. The template should include an executive summary section to use with the public, NGOs and other stakeholders.

Objective 2: Develop effective training and educational materials and programs on INRMP implementation.

1. *Develop and implement targeted training/educational workshops or programs.* Both broad and specific topic-oriented educational materials, courses or workshops will be useful to promote greater consistency among INRMPs, strengthen the connection between INRMPs and training and testing requirements, and improve overall INRMP planning and implementation. Training will be targeted at the individual needs of installation, local USFWS, and State fish and wildlife agency staff. A range of venues and approaches will be explored including use of the USFWS National Conservation Training Center to host a Sikes Act Training course, traveling workshops and training use of existing military training schools, Service military officers training schools,

regional workshops, teleconference workshops, add-ons to existing conferences, etc. Consideration will be given to developing appropriate educational and training materials for Federal land managers.

Objective 3: Finish delinquent INRMPs/Facilitate even flow of INRMP reviews and updates to USFWS.

1. *Finish Delinquents INRMPs.* The Sikes Act requires INRMPs to be finalized or reviewed within 5 years for those installations where an INRMP is required. Most of the first round of INRMPs are completed but a few are left to be finalized. Those installations with INRMPs that are not yet finalized are currently in the process of completing final coordination and signatures.

2. *Publish Guidance Clarifying Statutory INRMP Review Obligations.* DoD will amend its existing *Guidance for Implementation of the Sikes Act Improvement Act* and the USFWS its *Guidelines for Coordination with the DoD and Implementation of the Sikes Act* to correct any misunderstandings regarding the statutory responsibility to review existing INRMPs “as to operation and effect.” This clarification is expected to result in a revised and reduced estimate of the number of INRMPs necessitating revision.

Potential Gaps

1. Given the new Statutory authorities and need for some INRMPs to be updated, what is the best way to approach to manage the FWS incoming workload notwithstanding the recent clarification on updates/review?
2. Consider need for how best to ensure adequate staffing for FWS.

Objective 4: Ensure funding of INRMP projects.

1. *In Progress Reviews (IPR) Review of Funding Status.* Continue to track in the quarterly In Progress Reviews (IPRs), the status of funding for all Class 0 and 1 (Class 0/1) projects.

2. *Service Definition of Class 0 and 1 projects.* The most recent IPR revealed possible differences among the military services of their respective definitions of Class 0/1 projects. Upcoming IPRs should request the military services to define these to ensure projects are funding consistently across the military services. In addition, the military services should be asked to explain any apparent shortfalls in full funding of class 0/1 projects.

3. *Evaluate investment strategy.* The Conservation Committee should evaluate the comprehensive range management plans, current/revised INRMPs, and revised metrics and determine what prudent investments support mission accomplishment, enhance readiness, reduce future funding needs, ensure cost effective compliance, and maximize the existing resource capability. In addition, the Committee should make recommendations to change funding guidance, if appropriate.

Objective 5: Strengthen public comment process for INRMPs

DoD’s will revise its existing INRMP guidance to specify that when an installation proposes to make revisions to an existing INRMP that necessitate supplemental or new analysis under the National Environmental Policy Act, the installation will provide the public with a reasonable

opportunity to review and comment upon the revised INRMP before it is approved and implemented.

Objective 6: Overcome misperceptions and build understanding of DoD's Natural Resource management efforts and accomplishments.

1. *Host tours for stakeholders of military ranges.* DoD recently hosted a tour of military ranges and installations in southern California with key non-governmental organizations, some with special interests in protection of critical habitat and T&E species. The tour was success on many fronts and went a long way to dispelling false impressions regarding DoD's training operations and the constraints on these activities. The tours also helped to build an appreciation of the significant resource invested at military ranges and installations to conserve and mitigate impact to critical habitat and T&E species.