

INRMP STRATEGIC ACTION PLAN

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

*A 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's or the Department's) ability to properly manage the valuable natural resources entrusted to its care and to sustain the readiness of its force.

This Plan is designed to be a 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 that are used for training and testing provide a foundation for military readiness. Training ranges offer an opportunity to expose our troops to realistic threats and tactics of war. Test sites 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 and contain many significant natural resources such as wetlands, native prairies, and caves. Consequently, military installations and ranges are managed both for their military value and for their natural resources.

Two federal laws include requirements that provide an opportunity for the Department of the Interior to be involved in DoD's management of its natural resources at military ranges and installations. Section 7 of the Endangered Species Act (ESA), 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 Sikes Act, which requires the Department to carry out a program for the conservation and rehabilitation of natural resources on military installations, also requires DoD to prepare Integrated Natural Resource Management Plans (INRMPs) for all installations with significant natural resources. These plans must be prepared in cooperation with U.S. Fish and Wildlife Service (USFWS), an Interior agency, as well as the head of each relevant State fish and wildlife agency. Approximately 380 DoD installations and ranges are required to prepare an INRMP.

An INRMP is the primary tool used by DOD installations and ranges, to identify those activities that are needed 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, wildlife, or plants
- Integration of, and consistency among, the various activities conducted under the plan
- Establishment of specific natural resource management goals and objectives and time frames for proposed action

- Sustainable use by the public of natural resources to the extent that the use is not inconsistent with the needs of fish and wildlife resources
- Public access to the military installation that is necessary or appropriate and the use described in the bullet above subject to requirements necessary to ensure safety and military security
- Enforcement of applicable natural resource laws and regulations
- No net loss in the capability of military installations lands to support the military mission of the installation
- Such other activities as the Secretary of the military department determines appropriate

The National Defense Authorization Act (2003 Authorization) for Fiscal Year 2003 exempts the DoD from the Migratory Bird Treaty Act for the incidental take of migratory birds as a result of otherwise authorized military readiness activities until the Secretary of Interior prescribes regulations authorizing such take. With the passage of this 2003 Authorization, Congress has signaled that the DoD shall give appropriate consideration to the protection of migratory birds when planning and executing military readiness activities. The Department of Interior is currently finalizing this authorization in coordination with the DoD. As indicated in the proposed rule, migratory bird conservation will be incorporated into INRMPs, where applicable, to mitigate where needed and to protect migratory birds and their habitats.

The National Defense Authorization Act (NDAA) for Fiscal Year 2004 made important changes to the ESA regarding INRMPs, which were justified on the basis of the need to promote military readiness while protecting listed species. Under new Section 4(a)(3)(B)(i) of the ESA, the Secretary of the Interior or the Secretary of Commerce, as appropriate, is precluded from designating critical habitat on any areas owned, controlled, or designated for use by DoD where an INRMP has been developed that, as determined by the Interior or Commerce Secretary, provides a benefit to the species for which critical habitat designation is proposed.

The participation of local and regional USFWS 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 obligation to review and coordinate on INRMPs. More importantly, along with installation fish and wildlife staff, they have the technical expertise to identify programs and projects that will ensure the viability of species and the protection and restoration of critical habitat. Successful execution of INRMPs depends on adequate resourcing of DoD, USFWS and State fish and wildlife programs to support the INRMP process.

The ESA amendments and the 2003 Authorization are likely to result in greater scrutiny of INRMPs and their implementation given their increased importance in critical habitat designations. Therefore, DoD, USFWS and the states must be diligent in properly implementing the provisions of the Sikes Act, the Migratory Bird Treaty Act and the ESA. It is equally important to follow through on the commitments embodied in INRMPs, including with respect to high priority conservation and mitigation strategies.

In 2000, Congress passed the Conservation and Reinvestment Act, which amended the Federal Aid in Wildlife Restoration Act to establish the Wildlife Conservation and Restoration Account. States and territories must prepare wildlife conservation and restoration programs in order to receive funds from the account. If a state or territory receives funds from the account, they are also required to submit a Comprehensive Wildlife Conservation Strategy (CWCS) by

October 2005. These State CWCSs will be a blueprint for the future management of each state's wildlife. They will also present an opportunity for installations to integrate their conservation strategies into a larger state and national strategy.

Individual state efforts may involve:

- Threats assessment and identification of threats
- Ecosystem/landscape mapping
- Priority setting (but not ranking) of species in greatest need of conservation
- Metrics to assess progress in meeting strategic goals
- Recommended strategies (research, monitoring, mitigation/recovery strategies etc.)
- Programs and mechanisms to engage key partners, including federal agencies

STRATEGIC GOALS

Well-developed and effectively implemented INRMPs protect and enhance the natural resources on military installations, inspire confidence in DoD's stewardship of its natural resources and reduce the need for statutory and regulatory mandates with respect to such resources. This will result in a sustained ability to test and train, contributing to 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 Resources 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 avoid 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.

Likewise, a new regulation authorizing take of migratory birds as a result of military readiness activities puts a greater emphasis on the need to address migratory bird conservation in INRMPs to avoid potential violations of the Migratory Bird Treaty Act.

Responsible and Credible Implementation of New Authorities

The Administration placed a high priority on obtaining a change to the ESA to permit DoD the flexibility to manage its lands to benefit listed species using INRMPs. Under its purview, an INRMP may substitute for the designation by DOI 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 that 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 are more likely to 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. They 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 International Association of Fish and Wildlife Agencies (IAFWA) 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 parties, formalize the Sikes Core Group as a forum for identifying and resolving issues related to INRMPs 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 I 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 the Navy’s Charleston, SC meeting)
- USFWS three proposed criteria for benefiting species (in guidance relating to the Section 318 amendment of the ESA)
- 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, shortcomings, or successes as a result of INRMP implementation and 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.* The military services are developing INRMP templates to promote more efficient, timely and consistent review of INRMPs. DoD will consider the services’ templates, and if appropriate will develop a DoD 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 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 is 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’ 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

Given the new statutory authorities and need for some INRMPs to be updated, what is the best way to manage the FWS incoming workload notwithstanding the recent clarification on updates/review?

Objective 4: Ensure funding of INRMP projects.

1. *In Progress Reviews (IPR) Review of Funding Status.* Continue to track the status of funding for all Class 0 and 1 (Class 0/1) projects in the In Progress Reviews (IPRs).
2. *Service Definition of Class 0 and 1 projects.* The most recent IPR revealed possible differences among the military services in their respective definitions of Class 0/1 projects. Upcoming IPRs should ask the military services to define these to ensure projects are being funded 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 in coordination with the Range Sustainment Working Integrated Product Team will evaluate the comprehensive range management plans, current/revised INRMPs, and revised metrics and determine what prudent investments support mission accomplishment, enhance readiness, provide for long-term sustainment of resources, 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 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. *Where feasible, host tours for stakeholders of military ranges.* DoD has hosted tours of military ranges and installations in southern California and North Carolina with key non-governmental organizations, some with special interests in protection of critical habitat and T&E species. The tours were successful 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 resources invested at military ranges and installations to conserve and mitigate impact to critical habitat and T&E species.

2. *Attend and participate in appropriate conferences.* Sponsoring or attending appropriate conferences will increase visibility and opportunities to partner with a broader array of stakeholders, as well as promote a better understanding of stakeholder concerns.

3. *Develop and maintain informational materials for the public.* Develop appropriate new fact sheets and educational materials and update fact sheets already in place in concert with USFWS to help educate stakeholders on relevant topics.

Objective 7: Develop strategies to make use of new authorities to defer designation of critical habitat.

1. *Interface with State parties on development of Comprehensive Wildlife Conservation Strategies.* By communicating with state personnel early in the CWCS development process, DoD and USFWS personnel can provide input to the states to address applicable INRMP concerns. Such input may also enable the states to include information that will amplify the efforts toward INRMP conservation goals while building a foundation for their CWCSs. Input should help ensure the CWCSs provide for adequate protection outside of military installations and ranges for candidate and listed species found on military installations.