



**U.S. Fish and Wildlife Service  
Guidelines for Coordination on Integrated Natural Resource  
Management Plans**

**June 2015**

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

### **Addendum**

This document includes an addendum added in April 2018 that provides guidance for addressing pollinators in Integrated Natural Resource Management Plans.

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Figure 1: Fish and Wildlife Service Process for INRMP Review and Approval

Attachment 1: Memorandum of Understanding Between the U.S. Department of Defense and U.S. Fish and Wildlife Service and the Association of Fish and Wildlife Agencies

Attachment 2: Interagency Assistance Agreement between the United States Fish and Wildlife Service and the United States Air Force for the Conservation of Natural Resources on Air Force Controlled Lands

## **List of Abbreviations**

APP	Avian Protection Plan
ARD	Assistant Regional Director
BASH	Bird/Wildlife or Animal Aircraft Strike Hazard
BGEPA	Bald and Golden Eagle Protection Act
CCP	Comprehensive Conservation Plan
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
DoD	Department of Defense
DOI	Department of the Interior
ECOS	Environmental Conservation Online System
ESA	Endangered Species Act
FIS	Fisheries Information System
FLPMA	Federal Land Policy and Management Act
INRMP	Integrated Natural Resources Management Plan
LCC	Landscape Conservation Cooperative
MBTA	Migratory Bird Treaty Act
MIPR	Military Interagency Purchase Request
NCTC	National Conservation Training Center
NEPA	National Environmental Policy Act
NOAA	National Oceanic and Atmospheric Administration
NWR	National Wildlife Refuge
OLE	Office of Law Enforcement
RCRA	Resource Conservation and Recovery Act

Service	U.S. Fish and Wildlife Service
States	State fish and wildlife agencies
TAILS	Tracking and Integrated Logging System
USDA	United States Department of Agriculture

## **Introduction**

This document provides updated guidance to U.S. Fish and Wildlife Service (Service) personnel for implementing the requirements of the Sikes Act. It replaces the following memorandum: *Guidance for Coordination of Department of Defense Sikes Act Integrated Natural Resource Management Plans* (June 8, 2001). Additionally, guidance may be developed in the future to streamline the review process for Integrated Natural Resources Management Plans (INRMPs).

The Sikes Act directs the Secretary of Defense, in cooperation with the Service and the appropriate State fish and wildlife agencies (States), to prepare and implement INRMPs for Department of Defense (DoD) lands with significant natural resources. The DoD, the States and the Service are referred to as “the parties” throughout this document. The requirement to prepare and implement INRMPs was created by the 1997 Amendments to the Sikes Act, often referred to as the Sikes Act Improvement Act, and is intended to broaden the scope of DoD natural resource programs. INRMPs accomplish this in a number of ways including: (1) integrating natural resource programs with operations and training; (2) embracing the tenets of adaptive, ecosystem-based management while ensuring no net loss in the capacity of the installation to support the military mission; (3) providing a venue for public comment on installation natural resource programs; (4) strengthening funding justification for conservation activities on military lands; and (5) implementing conservation measures for the benefit of species management.

The Sikes Act provides requirements to monitor and improve the effectiveness of INRMPs. These include: (1) annual reporting for the Service and the DoD; and (2) INRMP reviews as to operation and effect by the parties, no less than every 5 years. This review provides a determination as to whether the plan needs a minor change or revision in order to continue to address adequately the purposes and requirements of the Sikes Act.

According to the Sikes Act, the preparation and implementation of INRMPs should be consistent “with the use of military installations to ensure the preparedness of the Armed Forces.” The Act states that an INRMP shall, to the extent appropriate and applicable, provide for no net loss in the capability of military installation lands to support the mission of the installation. INRMPs serve as cooperative plans for the conservation and rehabilitation of natural resources on approximately 25 million acres of military lands while maintaining military readiness. Further, these installations provided habitat for approximately 425 species listed under the Endangered Species Act (ESA).

## **Key Definitions**

Sikes Act activities and coordination with the military services are managed by several functional field units of the Service, but primarily Ecological Services field units. Reference to “field offices” throughout this guidance refers to any field unit that engages in Sikes Act activities.

The DoD and the Service jointly developed several definitions to improve communications within and among agencies. The following definitions from the 2013 MOU between the Service,

DoD and AFWA (see Attachment 1) should be used by Service staff engaged in INRMP-related activities.

**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, DOI, and each appropriate State fish and wildlife agency.

**INRMP revision:** Any change to an INRMP that, if implemented, may result in a significant environmental impact, including those not anticipated by the parties to the INRMP when the INRMP was last approved and/or reviewed as to operation and effect. All such revisions require approval by all parties to the INRMP, and will require 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 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.

**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 address adequately Sikes Act purposes and requirements.

Although we provide a definition for a compliant INRMP, this does not invalidate the use of existing INRMPs that do not meet the compliant INRMP signature date criterion. The Service will consider that INRMP currently being used to guide natural resource management on a given installation, irrespective of signature date or most-recent review for operation and effect, to be the operational equivalent of a compliant INRMP, so long as the Service has no objections to the natural resource management contained in this INRMP. The Service and DoD will generally treat such an operational INRMP as a suitable instrument for providing the installation with applicable exemptions or exclusions from designation of critical habitat as put forth under Section 4(a)(3)(B)(i) and Section 4(b)(2) and of the Act, (16 U.S.C. 1533(a)(3)(B)(i) and 1533(b)(2), respectively) if the Secretary determines in writing that such plan provides a benefit to the species for which critical habitat is proposed for designation.

If an operational INRMP lacks current information relative to the status of Candidate species and those species proposed for listing or listed as Threatened or Endangered under the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 et seq.), and/or requires the inclusion of updated or new management actions for the benefit of such species, such information can be provided to the Service in the form of an addendum to the operational INRMP. An addendum to the operational INRMP would be signed by the appropriate DoD and Service representatives and appended to its INRMP.



## **INRMP Coordination**

The Service is committed to continuing and expanding partnerships with the DoD and the States. Further, the Service has explicit responsibilities under the Sikes Act for cooperating with military installations that are required to prepare INRMPs. In accordance with the Sikes Act mandate for Service cooperation, when the Service is requested to participate in the planning, development, or concurrence of an INRMP, the appropriate office as designated by the Regional Director should collaborate with the requesting military service installation. Notifications should be sent to the Assistant Director–Fish and Aquatic Conservation and the Assistant Director–Endangered Species in the event that this cannot be achieved.

The Sikes Act states that INRMPs shall reflect mutual agreement of the military service, the Service, and the States and is reflected by signature of the plan or letter of concurrence. The overall goal of the parties is to reach agreement on the entire INRMP; however, it is a requirement that INRMPs reflect mutual agreement on the conservation, protection, and management of fish and wildlife resources. Mutual agreement is reflected by signature of the plan or letter of concurrence. The Sikes Act neither diminishes nor increases the legal authorities of an agency. The Sikes Act states that INRMPs shall cause no net loss in the capability of military installation lands to support the military mission of the installation; however, there may be instances in which additional alternatives or changes to the proposed action may need to be considered in order to fulfill legislative and regulatory requirements other than the Sikes Act. Examples of such instances can include complying with a biological opinion under the provisions of the Endangered Species Act (ESA), the protection of wetlands under provisions of the Clean Water Act, or protecting birds under the Migratory Bird Treaty Act (MBTA).

Early and regular participation with military installations in the preparation or revision of INRMPs will allow the Service to provide technical expertise and recommendations on the conservation, and management of natural resources on military lands. Perhaps more importantly, it will facilitate quicker review and processing of INRMP concurrence. There are several authorities available to facilitate partnering with military installations. These include:

**Title 10, United States Code 2684a, “Agreements to Limit Encroachments and Other Constraints on Military Training, Testing, and Operations”:** This was enacted by Congress as Section 2811 of the National Defense Authorization Act for fiscal year 2003. This authority represents a powerful tool and unique opportunity for the DoD to work in partnership with States, other governments, and public or private environmental and conservation groups to achieve a common goal of sustainability. By addressing incompatible land use and unconstrained development, it contributes to managing suburban sprawl and thereby, provides for wise-growth management. The compatible use authority allows the military to work with partners to encumber land to protect habitat and training without using the lengthy and complicated land acquisition processes.

**DOI Secretarial Order 3289, issued September 14, 2009:** This establishes Landscape Conservation Cooperatives, which focus on on-the-ground strategic conservation efforts at the landscape level. Landscape Conservation Cooperatives (LCCs) are management-science partnerships that inform integrated resource management actions addressing climate change

and other stressors within and across landscapes. They link science and conservation delivery. LCCs are true cooperatives, formed and directed by land, water, wildlife and cultural resource managers and interested public and private organizations. Federal, State, tribal, local government and non-governmental management organizations are all invited as partners in their development.

Field offices are encouraged to initiate and maintain contact with military installation natural resource managers through INRMP development and implementation teams. These teams should consist of at least the three parties designated in the Sikes Act. Members of INRMP teams could also include other regulatory agencies with an interest in the affected resources, adjacent government agency landowners, non-governmental groups, and stakeholders. National Oceanic and Atmospheric Administration (NOAA) Fisheries should be included in cases where commercial marine fisheries or other NOAA-regulated resources are involved.

FWS field offices are strongly encouraged to maintain contact with the State(s) that oversee(s) natural resource management on military installations throughout the INRMP preparation, review and revision process. FWS field offices are encouraged to participate in these partnerships to implement the Sikes Act by initiating and maintaining contact with military installation natural resource managers, through INRMP preparation, review, and implementation. The Service is required to report Sikes Act expenditures by the States, therefore maintaining contact is imperative.

### **FWS Program Responsibilities**

Ecological Services and, in some cases, Fish and Aquatic Conservation program field offices are the lead offices for implementing Sikes Act activities and are responsible for coordinating INRMP development and reviews with other Service field offices and Regional Offices. If an installation is within the jurisdiction of more than one field office, the Regional Office will designate a lead field office.

Regional Sikes Act coordination and implementation responsibilities lie with either the Assistant Regional Director (ARD) for Ecological Services or, in the case of Region 6 for example, Fisheries. As of the date of this guidance, the most up to date list of Regional Sikes Act Coordinators is on the website at [http://www.fws.gov/fisheries/sikes\\_act/index.html](http://www.fws.gov/fisheries/sikes_act/index.html), however the site address is subject to change. The Regional Sikes Act Coordinators will ensure any INRMP issues elevated from the field office to the Regional Office receive coordination with all appropriate Service programs. The Regional Sikes Act Coordinators are also responsible for providing the National Sikes Act Coordinator with updates on INRMP review status, implementation, annual reporting, and other Sikes Act related information. The Regional Sikes Act Coordinators are also responsible for ensuring that field offices enter Sikes Act reporting data into the Service's Environmental Conservation Online System (ECOS) database in a timely manner.

A compliant INRMP requires the signature of an authorized DOI official (see Key Definitions). As of June 2009, the Acting Director authorized Regional Directors to delegate INRMP signature authority to the field office level. Please refer to regional guidance for specific

direction and exceptions, as some Regional Directors have retained signature authority in many cases, such as:

1. The INRMP is the first one completed for an installation;
2. Several field offices are responsible for an installation;
3. Environmental contaminant issues coordination is required at the regional level;
4. Coordination of migratory bird issues is required at the regional level;
5. Refuge lands abut the installation, requiring Regional Office review;
6. Field offices have funding or workload issues that may have precluded full Service coordination; and,
7. Litigation issues.

In the headquarters office, the lead for coordinating the Service's Sikes Act responsibilities is under the purview of the Assistant Director–Fish and Aquatic Conservation. This includes coordinating with the DoD on Sikes Act activities and responding to inquiries from within the Service, other agencies, the States, the public, and Congress. Additionally, the Assistant Director–Endangered Species maintains the lead for coordinating with DoD on ESA and critical habitat matters. The Assistant Director–Endangered Species administers the Conservation Planning Assistance program which is frequently the lead for INRMP coordination and reviews.

### **Determining Whether an INRMP is Required**

The Sikes Act requires the Secretary of Defense to carry out a program for the conservation and rehabilitation of natural resources on lands used by the military. INRMPs are used to implement this program. However, it is also important to note that INRMPs are not required on DoD lands that do not have significant natural resources.

Under the Sikes Act, “the Secretary of each military department shall prepare and implement an INRMP for each military installation in the United States under the jurisdiction of the Secretary, unless the Secretary determines that the absence of significant natural resources on a particular installation makes preparation of such a plan inappropriate.” The decision as to whether an installation is to prepare an INRMP rests with the Secretary of the military department that has jurisdiction over the installation in question. Installations subject to a recommendation for closure under the Defense Base Closure and Realignment Act of 1990, as amended, are excluded from the requirement to prepare an INRMP. If the military determines that an installation requires an INRMP, the Service is required to work in cooperation with the military to prepare each INRMP.

### **Military Withdrawals**

Public lands may be withdrawn from the public domain and reserved for military training and testing in support of our national defense requirements. Lands so designated are usually

withdrawn from all forms of appropriation under the public land laws, including the mining laws, but not the mineral and geothermal leasing laws and the Materials Act of 1947. Withdrawals are accomplished by the Bureau of Land Management in response to laws or legislative actions ordered by Congress or an administrative action by the Secretary of the Interior. Withdrawn military lands usually continue to require INRMPs and agreements to carry out environmental compliance and response responsibilities.

## **INRMP Contents and Requirements**

Information on the contents and requirements of INRMPs is found in the Sikes Act and in DoD policies and guidance documents. This information is summarized below and website links are provided to access the DoD documents.

The Sikes Act defines the purposes of natural resources management on military lands as “the conservation and rehabilitation of natural resources on military installations; the sustainable multipurpose use of the resources, which shall include hunting, fishing, trapping, and non-consumptive uses; and, subject to safety requirements and military security, public access to military installations to facilitate the use [of these resources].” The Sikes Act requires not simply writing, reviewing and revising INRMPs, but also implementing them. Further, the Sikes Act requires that each INRMP shall, where appropriate, and applicable, provide for:

- No net loss in the capability of military installation lands to support the military mission of the installation;
- 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;
- Sustained 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 subject to requirements necessary to ensure safety and military security;
- Enforcement of applicable natural resource laws (including regulations); and,
- Such other activities as the Secretary of the military department determines appropriate.

INRMPs typically include a description of the installation, its mission, how training requirements are supported while protecting the environment, and the role of natural resources on the installation in the context of the surrounding ecosystem. DoD requires INRMPs to be prepared

in coordination with installation master plans, range plans, training plans, integrated cultural resources management plans, integrated pest management plans, installation restoration plans that address contaminants covered by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and related provisions and the Resource Conservation and Recovery Act (RCRA), and any other appropriate military plans. In addition, an INRMP should also consider the effects of implementation on the installation's natural resource management activities in a regional context.

INRMPs should not be a comprehensive compilation of detailed information on all these topics, but instead should briefly summarize the key interrelationships with relevant plans, reference where the plans may be obtained, and describe where detailed information can be found. Ideally, an INRMP should be an easily referenced and frequently referred to working document.

Field offices working with installations to prepare or review INRMPs should coordinate with other field offices to include Ecological Services, Fish and Wildlife Conservation Offices, Refuges, Hatcheries, Law Enforcement Offices and the Regional Office to ensure INRMPs are thoroughly reviewed by the programs. Field offices should also work in coordination with State fish and wildlife agencies.

#### INRMP Review and Section 7 Consultations Pursuant to the ESA

If an action proposed in an INRMP "may affect" a species listed as threatened or endangered under the ESA, or a listed species' designated critical habitat, section 7 consultation shall be completed prior to the Service's concurrence of the INRMP. Additionally, if an action proposed in an INRMP is likely to adversely affect proposed species or adversely modify proposed critical habitat, a conference should be initiated by the installation. Formal ESA compliance should be addressed early in the INRMP preparation and review process. Evaluation of the potential effects of an INRMP on listed species and critical habitat should address all activities that may affect listed species or critical habitat and the evaluation should reflect how the INRMP may be addressing or managing those effects. For INRMPs which may affect listed species, the Service should assist the installation in incorporating conservation measures (including recovery plan tasks) into the development of the INRMP.

The Service will not concur with any INRMP for which a jeopardy or adverse modification Biological Opinion has been issued unless the military installation commander commits to implementing the Reasonable and Prudent Alternative(s).

When reporting section 7 consultation expenditures as required annually in ECOS under the Sikes Act, only those expenditures related to goals, conservation actions or other objectives in the INRMP and the consequences of implementing the INRMP should be reported.

## Critical Habitat: ESA Section 4(a)(3) Amendment

Section 318 of the National Defense Authorization Act for Fiscal Year 2004 (Public Law No: 108-136) amended the ESA by adding a new section 4(a)(3)(B)(i), that the Service “shall not designate as critical habitat any lands or other geographical areas owned or controlled by the Department of Defense, or designated for its use, that are subject to an integrated natural resources management plan prepared under section 101 of the Sikes Act (16 U.S.C. 670a), if the Secretary determines in writing that such plan provides a benefit to the species for which critical habitat is proposed for designation.”

The conference report, H.R. 108-354, provides some additional insight into the intent of the provision:

*The conferees would expect the Secretary of the Interior to assess an INRMP’s potential contribution to species conservation, giving due regard to those habitat protection, maintenance, and improvement projects and other related activities specified in the plan that address the particular conservation and protection needs of the species for which critical habitat would otherwise be proposed. Consistent with current practice, the Secretary would establish criteria that would be used to determine if an INRMP benefits the listed species for which critical habitat would be proposed.*

*Consistent with current practice, the committee would expect the Secretary of Interior to use established criteria to determine if an INRMP provides special management considerations or protection, such as: (1) a current, complete plan that provides sufficient conservation benefit to the species; (2) a plan that provides assurances that the conservation management strategies will be implemented; and (3) a plan that provides assurances that the conservation management strategies will be effective.*

When the Service is developing a proposed critical habitat designation for a species whose range includes a DoD installation or whose conservation may be affected by management of a DoD installation, a field office will contact the known affected DoD installations/facilities.

To be exempted from critical habitat designation, an installation must have a compliant INRMP or an operational INRMP subject to the determinations indicated on page 6. The INRMP should provide a benefit to the species by addressing maintenance of the physical or biological features essential to the conservation of the species (also known as primary constituent elements) for the species in question. An INRMP can still be found to provide a benefit to a species even if the species is not directly addressed in the INRMP. In this case, benefit is defined as providing adaptive conservation management for the features essential to the species (i.e., its habitat) or the species itself either directly or indirectly (by providing these measures for another species and thus resulting in a benefit for the subject species). Adaptive conservation management measures should have a feedback loop to ensure that the conservation measures are effective and assurance that these measures will be implemented.

Critical habitat designations are made at headquarters and reviewed by the Regional Offices based on information from the field offices and the military. In most instances, the rulemaking

document (i.e., proposed or final rules) for the critical habitat designation constitutes the written determination that the INRMP provides a benefit to the species.

The Service previously has considered three criteria when determining whether INRMPs provide a benefit to the species. These new guidelines formalize the new criteria, and procedures for exempting critical habitat with an INRMP. To determine whether a plan provides a benefit to the species, the Service will do the following:

(1) Assess an INRMP's potential contribution to species conservation, giving due regard to those habitat protection, maintenance, or improvement projects and other related activities specified in the plan that address the particular conservation and protection needs of the species for which critical habitat would otherwise be proposed. Although evaluation will be easier if the species is specifically addressed in the INRMP, that is not a requirement; the requirement is that the species receives a benefit from the INRMP.

Thus, exemption under Section 4(a)(3) requires a written determination by the Service that an INRMP provides a benefit to the species for which critical habitat is being proposed. We assess an INRMP's potential contribution to species conservation by considering the cumulative net benefits of the management activities identified in the INRMP for the length of the plan. These benefits must be at least equal to those that we could reasonably require under or realize through a section 7 consultation addressing possible adverse modification of critical habitat within the area covered by the plan. Examples of a benefit include: reducing fragmentation of habitat; maintaining or increasing populations; planning for catastrophic events; protecting, enhancing, or restoring habitats; buffering protected areas; and testing and implementing new conservation strategies.

(2) Presume that the species related measures outlined in the INRMP will be funded and implemented unless the Service has specific reasons to believe there may be a problem. In such a case, consult with the Regional Office on what types of assurances may be needed from the military installation to address these specific problems.

(3) Consider whether the INRMP provides assurances that the conservation measures in the plan will be effective. When determining the effectiveness of a conservation effort, the Service considers whether the plan includes: (a) biological goals (broad guiding principles for the program) and objectives (measurable targets for achieving the goals); (b) quantifiable, scientifically valid parameters that will demonstrate achievement of objectives, and standards for these parameters by which progress will be measured; (c) provisions for monitoring and, where appropriate, for adaptive management; (d) provisions for reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness of the conservation effort (based on evaluation of quantifiable parameters); and (e) a description of a temporal duration sufficient to implement the INRMP and achieve the benefits of the goals and objectives of the plan.

## Written Determination Procedures

The process for making the determination that a plan provides a benefit to the species can be made in one of several ways:

- For a draft INRMP under review by the Service, the determination may be made simultaneously with the INRMP review process and be included in the concurrence letter.
- For an existing INRMP, the Service can make a stand alone determination that the INRMP provides the required conservation benefit to qualify as a Sec. 4(a)(3)(B) exemption under the ESA. This can be done through (1) a letter to the installation; (2) memo to the administrative record; or, (3) the preamble of the Critical Habitat rule as published in the Federal Register.

See section 4(B)(2) of the ESA for information regarding exclusions. If you have questions regarding this process, please contact the Regional or Headquarters listing offices or Sikes Act Coordinators.

## Critical Habitat: ESA Section 4(b)(2) Amendment

Public Law No. 108-136 also amended section 4(b)(2) of the ESA of 1973 (16 U.S.C. 1533(b)(2)) by inserting “the impact on national security” after “the economic impact.” Thus, the section now reads:

*The Secretary shall designate critical habitat, and make revisions thereto, under subsection (a)(3) on the basis of the best scientific data available and after taking into consideration the economic impact, **the impact on national security**, and any other relevant impact, of specifying any particular area as critical habitat. The Secretary may exclude any area from critical habitat if he determines that the benefits of such exclusion outweigh the benefits of specifying such area as part of the critical habitat, unless he determines, based on the best scientific and commercial data available, that the failure to designate such area as critical habitat will result in the extinction of the species concerned.*

If the INRMP does not meet the section 4(a)(3) standards for exemption, then we will evaluate exclusion of these DoD lands from the final designation pursuant to section 4(b)(2) of the ESA. The Service will consider exclusions pursuant to section 4(b)(2) if we have reasonably specific comments from the DoD in the record that indicate that there may be possible impacts to national security or military readiness due to a critical habitat designation that could not be reasonably addressed through a consultation under section 7 of the ESA. The Service will defer to the military regarding issues that fall under its expertise, including the determination of what constitutes an impact on national security and military readiness. However, the Service must be provided sufficient specific justification of these impacts, for the administrative record, in order to conduct an adequate section 4(b)(2) balancing. The Service cannot justify section 4(b)(2) exclusions only based on generalized statements.



### Recovery Permits: ESA Section 10(a)(1)(A) Permits

If an action proposed in or funded through an INRMP is for scientific purposes or to enhance the propagation or survival of a listed species, and would result in the purposeful take of a listed species, the installation must request a Recovery Permit from the Service.

### Addressing Environmental Contaminant Issues in INRMPs

The Service recommends the role of environmental contaminants in natural resource or ecosystem management on DoD lands be addressed in INRMPs if the INRMP development team deems appropriate. The INRMP provides an appropriate mechanism to summarize the key interrelationships with various plans pertaining to contaminants, reference where the plans may be obtained, and describe where detailed information can be found. As a part of the INRMP development and implementation team responsibilities, the Service and the installation should consider environmental contaminant remediation and management to ensure that the management of fish, wildlife and their habitats on installations will not be adversely affected by the management of environmental contaminants.

INRMPs should not duplicate other documents, but where appropriate and relevant to natural resource management, the INRMP may include information on specific projects. Various regulatory authorities, such as CERCLA and RCRA, require military installations to monitor, manage and clean up environmental contaminants on DoD properties. Military installations must develop documents and programs to comply with these authorities. The Service is also responsible for monitoring, reviewing, consulting, commenting, permitting, and implementing many of these same regulatory authorities; therefore, it is not appropriate for the Service to replicate this effort in Sikes Act processes. The Service encourages field offices to work with military installations to develop these programs and to summarize appropriate contaminant-related issues in INRMPs. Examples of contaminant-related issues that may be summarized in INRMPs include hazardous substance disposal, pesticide use, oil and chemical spills, contamination of surface waters and associated groundwater, wildlife and fish die-offs or reduced reproduction, ordnance disposal, etc. The INRMP should include a section summarizing known or suspected contaminant-related issues and management actions taken, or identify if additional information is needed. Other installation environmental documents may be referenced in the INRMP. The goal is for FWS Environmental Contaminants technical staff to ensure that actions (including habitat restoration or site remediation) that are intended to provide benefits to resources do not result in adverse impacts.

### Addressing Invasive Species Prevention and Management in INRMPs

INRMPs provide an excellent planning tool for consideration of invasive species prevention and management. INRMPs may include new or existing plans to prevent the introduction of invasive species and provide for their control, as well as to minimize the economic, ecological, and human health impacts that invasive species cause. Under Executive Order 13112, Federal agencies whose actions may affect the status of invasive species shall: (1) identify such actions,

(2) use relevant programs and authorities to prevent, control, monitor, and research such species, and (3) not authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species in the United States or elsewhere. Executive Order 13112 also establishes an Invasive Species Council, which provides national leadership regarding aquatic and terrestrial invasive species. The Council has prepared a National Invasive Species Management Plan, which details performance-oriented goals and objectives as well as specific measures of success for Federal agency efforts concerning invasive species. This plan and other resources which may be useful for addressing the prevention and management of invasive species in INRMPs can be accessed at the Council website: [www.invasivespecies.gov](http://www.invasivespecies.gov)

In addition, note that DoD provides guidance to installations on including pest management considerations in INRMPs which support Executive Order 13112. For example, the DoDI 4715.03, Enclosure 3, Procedures, 1.i., states:

*The installation INRMP shall include management measures for biosecurity, in Reference (s), to prevent introduction or spread of noxious species and stray or feral animals that affect natural resources or, alternatively, reference control measures included in the Integrated Pest Management Plan and include that plan as an appendix item consistent with Reference (r). [DoD Instruction 4150.07, "DoD Pest Management Program," May 29, 2008] In addition, the installation should control pests to minimize impacts to the natural environment, in-water species, and species vulnerable to pesticides such as amphibians.*

### Addressing Migratory Bird Management in INRMPs

Field offices should coordinate with their Regional Office on migratory bird issues to ensure that migratory bird conservation is addressed in INRMPs during the development and review process in accordance with Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds (66 FR 3853 [January 17, 2001]) and Director's Order 172, 06/09/04, Responsibilities of Federal Agencies to Protect Migratory Birds. A *Memorandum of Understanding between the U.S. Department of Defense and U.S. Fish and Wildlife Service to Promote the Conservation of Migratory Birds* was signed September 5, 2014. INRMPs should include discussions of the responsibilities under the Military Readiness Rule (50 CFR 21.15; Authorization of take incidental to military readiness activities) and the MOU under EO 13186. These responsibilities include (but are not limited to):

- How the NEPA process is used to analyze impacts to migratory birds resulting from readiness and non-readiness activities;
- Specific obligations contained with the 2014 DoD MOU to promote the conservation of migratory bird populations while sustaining the use of military managed lands and airspace for testing, training, and operations;
- How bird conservation principles, measures, and practices are integrated into agency planning and actions;
- Actions that avoid or minimize, to the extent practicable, the exposure of birds and their resources to avian stressors that result in take; and,

- Installation programs to monitor bird populations as described in the Military Readiness Rule and 2014 MOU, focusing on birds listed as Birds of Conservation Concern (USFWS 2008).

INRMPs should be developed in coordination with the various national and/or regional migratory birds plans (e.g., North American Waterfowl Management Plan, North American Waterbird Conservation Plan, Partners in Flight, and U.S.A. Shorebird Conservation Plan) for the management of bird populations. INRMPs should include details on resources available to address migratory bird conservation and development of conservation measures.

If bald eagles (*Haliaeetus leucocephalus*) and/or golden eagles (*Aquila chrysaetos*) occur on military installations or within ten miles of the proposed military activities, it is recommended that such actions be analyzed for negative impacts to the eagles, their habitats, and regional populations. While the bald eagle has been removed from the Federal list of threatened and endangered species (August 8, 2007; 72 FR 37346), the bald eagle along with the golden eagle continues to be protected under the Bald and Golden Eagle Protection Act (BGEPA) of 1940, as amended (16 U.S.C. 668-668d) and the Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). Both the BGEPA and the MBTA prohibit take as defined as “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, destroy, molest, disturb, or otherwise harm eagles, their nests, or their eggs.” Under the BGEPA, “disturb” means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available: (1) injury to an eagle; (2) decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior; or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.

On September 11, 2009 (74 FR 43686), the Service promulgated a rule establishing two new permit types: (1) take of bald and golden eagles that is associated with, but not the purpose of, the activity; and (2) purposeful take of eagle nests that pose a threat to human or eagle safety. Field offices should work to ensure that the proper Service and State personnel are coordinating with the military installations early in the INRMP planning process to ensure compliance with regulations and to develop a survey protocol to evaluate the potential risk and the likelihood of take of eagles. If take is reasonably anticipated to occur, it is recommended that an Eagle Conservation Plan (ECP) be developed in coordination with State wildlife agencies and the Service. An ECP is intended to outline information that can avoid, minimize, or mitigate impacts to these species and establish the need for an Eagle Take Permit.

Bird/Wildlife Aircraft Strike Hazard (BASH) issues need to be considered if the installation has a flying mission. If the installation has a separate BASH Plan, it should be referenced in the INRMP. Field offices should ensure the DoD coordinate with the Service and USDA Animal and Plant Health Inspection Service–Wildlife Services to develop measures that will minimize air strikes with minimal impact to local bird populations (e.g., habitat modifications in combination with take of birds). Helpful websites include <http://wildlife.faa.gov/> and <http://www.afsec.af.mil/organizations/bash/index.asp>

### Addressing National Wildlife Refuge Planning in INRMPs

If a National Wildlife Refuge (NWR) is adjacent to an installation or in an ecosystem that could be strategically managed in cooperation with a refuge, field offices should help to coordinate refuge comprehensive conservation plan (CCP) goals with INRMPs. Field offices should encourage installations to consider including nearby refuges as partners on INRMP Implementation Teams.

### Addressing Wildlife and Sport Fish Restoration Programs in INRMPs

Under the State and Tribal Wildlife Grant Program, State(s) are required by Federal law to have a State Comprehensive Wildlife Conservation Plan in place and review them every ten years, in order to be considered for Federal grants. These strategies provide an essential foundation for the future of wildlife management and a stimulus to engage the States, Federal agencies and other conservation partners to strategically think about their individual and coordinated roles in prioritizing conservation efforts in each State and territory. Field offices are encouraged to participate in the development and implementation of INRMPs and State Comprehensive Wildlife Conservation Plans to ensure State objectives are incorporated in INRMPs.

### Role of Law Enforcement

The Office of Law Enforcement (OLE) investigates wildlife crimes, regulates wildlife trade, helps Americans understand and obey wildlife protection laws, and works in partnership with international, Federal, State, and tribal counterparts to conserve wildlife resources. The OLE also supports the efforts of States and tribes to protect resident species from poachers who traffic in illegally taken fish, wildlife, and plants.

### Addressing the National Environmental Policy Act in INRMPs

DoD policy requires that each of the military services provide an opportunity for public comment on INRMPs. DoD policy states that the National Environmental Policy Act (NEPA) process may be used to meet DoD's public review requirements and to document the decision to adopt an INRMP; however, if NEPA is not used, the public must be provided a meaningful opportunity to comment on the plan and should be afforded a minimum of 30 days to do so. DoD requires military installations to afford the Service and States the opportunity to review all public comments received on their INRMPs. This will inform the Service and States of potential concerns sufficiently early in the review process to permit appropriate consideration. Guidance on Service employee responsibilities regarding NEPA are outlined in Director's Order 127: National Environmental Policy Act. A NEPA compliance checklist is available to determine if an Environmental Assessment is required:  
[http://www.fws.gov/midwest/endangered/permits/documents/nepa\\_compliance\\_checklist.pdf](http://www.fws.gov/midwest/endangered/permits/documents/nepa_compliance_checklist.pdf)

## Department of Defense Sikes Act Policies and Guidance

Reviewing the most recent guidance available from DoD and its military components can be useful in both coordinating with an installation and in reviewing INRMPs. However, note that these are intended specifically for DoD and entities under their purview. The following websites contain DoD Sikes Act policies and guidance:

Department of Defense - <http://www.denix.osd.mil/nr/LegislationandPolicy/PolicyandGuidance/dodinstructions.cfm>

U.S. Air Force - *Integrated Natural Resources Management, Air Force Instruction 32-7064, USAF, November 18, 2014*, available at the following website: [http://static.e-publishing.af.mil/production/1/af\\_a4/publication/afi32-7064/afi32-7064.pdf](http://static.e-publishing.af.mil/production/1/af_a4/publication/afi32-7064/afi32-7064.pdf)

U.S. Army - *Army Regulation 200-1: Environmental Quality; Environmental Protection and Enhancement, December 2007*, is available at the following website: [http://www.apd.army.mil/pdffiles/r200\\_1.pdf](http://www.apd.army.mil/pdffiles/r200_1.pdf)

U.S. Marine Corps - *Handbook for Preparing, Revising and Implementing Natural Resources Management Plans on Marine Corps Installations, USMC, May 2004*, available at the following website: <http://www.marines.mil/News/Publications/ELECTRONICLIBRARY/ElectronicLibraryDisplay/tabid/13082/Article/125782/headquarters-us-marine-corps-handbook-for-preparing-revising-and-implementing-i.aspx>

U.S. Navy – *Integrated Natural Resources Management Plan Guidance for Navy Installations, April 2006*, available at the following website: [http://www.dodworkshops.org/files/Training/References/2006\\_Navy\\_INRMP\\_Guidance.pdf](http://www.dodworkshops.org/files/Training/References/2006_Navy_INRMP_Guidance.pdf)

## **INRMP Review and Mutual Agreement**

### Annual INRMP Reviews

The Sikes Act directs the parties to review INRMPs for operation and effect on a regular basis, but not less than every five years. The DoD has interpreted this to mean recommended annual reviews, and a required review for each INRMP at least every five years. The formal review requires concurrence by each of the parties; however, the annual review can be informal and is intended to keep INRMPs current and the parties informed. While the Sikes Act does not explicitly call for annual reviews and they do represent additional work load in the short term, they may be useful for expediting reviews for operation and effect every five years, thus potentially reducing workloads over the long term. Where feasible, field office participation in annual reviews is encouraged. Where funding, staffing levels or other limitations preclude engagement in annual reviews, the field office should notify the requesting installation in writing that the field office will be unable to participate.

An annual review is conducted at the field office level and is initiated by the installation in most cases. The DoD requires all installations to conduct annual reviews by assessing seven focus areas. The seven focus areas were designed to measure INRMP effectiveness and partnership success. Annual reviews usually consist of a regularly scheduled meeting of representatives from the Service, the installation, the State, and other partners as appropriate. The installation may provide the option to participate via webinar, teleconference or other means. Each installation is expected to invite feedback from the Service and States concerning how effectively the INRMP is being implemented. Installations are expected to inform the Service and States on an annual basis which INRMP projects are of the highest priority for funding.

The outcome of the annual review meeting – highlighting the changes needed to the INRMP or new information for consideration during a future review for operation and effect – should be ideally be documented in a memo from the parties preparing the INRMP and addressed to the appropriate officials of each party. For the Service, this would be the Field Supervisor. Depending upon regional policy, it may also be necessary to send a courtesy copy to the Regional Sikes Act Coordinator. These annual memos could be used to update the INRMP for the five-year review for operation and effect and have the potential to make the formal INRMP review process more efficient.

#### Formal Review and INRMP Concurrence Process

According to the Sikes Act, INRMPs must be reviewed for operation and effect not less than every five years. The formal INRMP review and concurrence process begins when DoD installations contact the Service field office requesting participation in the planning, preparation, and review of INRMPs. One field office will be designated by the Regional Office as the lead for INRMP review and will coordinate with other Service programs and field offices that may be actively participating in, or have an interest in the management of fish and wildlife resources on the installation or adjoining lands.

The Sikes Act requires the DoD, the Service, and the States to “mutually agree” to a plan for the “conservation, protection, and management of fish and wildlife resources” on specific military installations. Mutual agreement for each INRMP should be reaffirmed by the parties every five years through a formal review. For the Service, mutual agreement requires field office review and concurrence. The INRMP review for operation and effect, whether a revision is needed or not, should ideally be documented with a memo of a meeting or decision by the parties. If the parties mutually agree that no INRMP revision is necessary, the date of the memo should be recorded as the INRMP concurrence date. A copy of the INRMP signature page or concurrence letter should be provided to the Regional Sikes Act Coordinator who will provide a copy to the National Sikes Act Coordinator. Service review and concurrence is required for new INRMPs and at least every five years for existing INRMPs whether they have been revised or not.

Similarly, as described in the annual review section above, annual reviews and any changes needed to the INRMP should be documented in a memo from the parties. These memos may be referenced when the INRMP undergoes a review for operation and effect every five years.

The following outline is a summary of the review, coordination, and concurrence process for formal INRMP reviews. Note that the installation actions in steps 1 through 5 are per DoD policies, not necessarily Service policy. A simplified flow chart of this process is presented in Figure 1.

1. An installation may conduct an annual review and encourage the Service and States to provide feedback. Wherever feasible, meetings and site visits with installation environmental and natural resources personnel are strongly encouraged.
2. Each installation will advise the lead field office of its intent to prepare or revise an INRMP within 30 days of starting such action, and will concurrently request that the field office participate in the development or review for operation and effect of the INRMP. In response, the field office will inform the installation of the INRMP concurrence process, and advise the installation of the need for compliance with any wildlife laws (e.g., MBTA, ESA and BGEPA) that may apply to the INRMP review/revisions. Field offices will participate in planning and development, or revisions of INRMPs, to the maximum extent possible within time and staff constraints. If field office personnel are not available to participate in INRMP reviews, the installation may be referred to the Regional Sikes Act Coordinator for direction.
3. Installations will notify the appropriate field office at least 60 days in advance of its intent to provide a draft INRMP for review and coordination.
4. Each installation will provide the initial draft INRMP for review and comment to the Service and State. The field office will provide a copy of the cover letter and the draft INRMP sent from the installation to the Regional Sikes Act Coordinator as notification that the INRMP review process has begun.
5. Each DoD installation will request acknowledgment of receipt of the draft INRMP within 15 days of receipt by the field office. The field offices will provide acknowledgement of receipt of the draft INRMP within 15 days.
6. The lead field office will coordinate review of the draft INRMP with other Service programs or field offices, as appropriate, to ensure complete programmatic participation in INRMP development and review. The lead field office may also request that the installation provide copies of the INRMP to other offices.
  - a. The lead field office will consolidate comments from all field offices and program areas into one response letter from the Service to the installation.
  - b. The lead field office will resolve conflicting comments and recommendations within the Service, prior to sending a response letter to an installation.
  - c. The lead field office will ensure review of the INRMP by appropriate Service staff (e.g., Ecological Services, Endangered Species Interagency Consultations) regarding compliance with Section 7 of the ESA.

- d. Appropriate field office personnel will review the INRMP concerning the conservation, protection, and management of species which are or may be proposed for listing under the ESA.
  - e. Appropriate field office staff will review the INRMP to evaluate the provisions in the plan for providing special management or protection of areas that are, or will be, proposed for critical habitat designation.
  - f. The lead field office will seek appropriate Service staff (i.e., Office of Migratory Birds) review of the INRMP concerning Executive Order 13186, "Responsibilities of Federal Agencies to Protect Migratory Birds," and in accordance with Director's Order 172, to ensure migratory bird conservation is addressed by the INRMP.
  - g. Additionally, when consistent with military requirements, the appropriate Service staff should ensure that INRMPs promote the sustainable use of natural resources by the public through hunting and fishing programs, and also provide environmental education opportunities.
  - h. The lead field office will contact the State to discuss the INRMP and any concerns.
7. The Service should encourage the conservation, protection, and management of all fish and wildlife resources and incorporate the principles of strategic habitat conservation when reviewing plans. Therefore, INRMPs should be reviewed with regard to resource management opportunities and support captured in existing plans (e.g., Endangered Species Recovery Plans; Bird Conservation Plans; Fisheries Management Plans; State Comprehensive Wildlife Management Plans; Landscape Conservation Cooperative plans; and other relevant regional, State and local plans).
8. The field office will provide comments, or preliminary concurrence, on the draft INRMP within 60 days of receipt, unless the Service and the DoD both agree to a longer review period, and with the following exceptions:
- a. If formal section 7 consultation is required pursuant to the ESA, the time frames for that process will apply; or
  - b. If the installation requests that the INRMP substitute for designation of critical habitat or if the Service determines that the installation has lands which are, or may be, proposed for critical habitat.
9. The initial comment letter that is submitted by the field office to an installation will indicate one of the following:
- a. The field office finds the INRMP acceptable and the installation should forward the INRMP to the Service INRMP signatory for final review and Service concurrence; or
  - b. The field office finds the INRMP acceptable with some recommendations for modifications, and after consideration of these recommendations, the installation should forward the INRMP to the Service INRMP signatory for final review and Service concurrence; or



- c. One, or a combination, of the following:
  - i. The field office does not agree with the conservation, protection, and management of fish and wildlife resources proposed in the INRMP and requests major modifications and/or further information, that should be submitted back to the field office for further consideration; and/or
  - ii. Threatened and endangered species issues related to the INRMP have not been resolved and/or formal section 7 consultations may be required. The field office will inform the installation of the requirements of section 7 of the ESA and the time-frames for the process; and/or
  - iii. The installation has lands that are, or may be, proposed for critical habitat designation and the Service is reviewing the INRMP to determine whether it affords the necessary species benefits to preclude critical habitat designation. The field office will inform the installation of this review and the associated time frames.
- 10. The field office will furnish copies of their comment letter(s) to the Regional Sikes Act Coordinator and the State. Similarly, the installation will request that the State provide a copy of its comment letter(s) to the Service.
- 11. Some Regional Offices have delegated INRMP signature authority to field offices. Refer to the Regional Office delegation memos for more specific guidance.
- 12. If a Regional Office review is required, the Regional Sikes Act Coordinator will coordinate the INRMP review with all appropriate ARDs to ensure complete programmatic review and regional consistency in INRMP concurrence. The Regional Sikes Act Coordinator will collate comments from ARDs into a single regional response to an installation within 60 days, unless more time is allowed per mutual agreement by the installation and the Service.
- 13. The Service INRMP signatory will provide copies of the final concurrence letters or a signature page to the Regional Sikes Act Coordinator and the National Sikes Act Coordinator.
- 14. If conflicts remain after efforts to resolve issues concerning the conservation, protection, and management of fish and wildlife resources in the INRMP, the Service must determine whether the Service will withhold concurrence on the plan. The Regional Director will make a determination to either withhold Service agreement or provide agreement on the plan with recommendations or caveats. Signatories must bear in mind that the clear intent of the Sikes Act is to provide for the preparation and implementation of cooperative plans that reflect the mutual agreement of the parties. However, it is not intended to be a regulatory instrument. The Sikes Act emphasizes that conservation activities must be "... consistent with the use of military installations to ensure the preparedness of the Armed Forces ..."

## **Interagency Agreements**

The Sikes Act provides several authorities that facilitate the military establishing interagency agreements with the Service. The DoD may fund the Service to conduct INRMP implementation work. Field offices should ensure that the installation natural resource managers are aware of the following funding authorities that allow them to contract with the Service and/or other appropriate agencies or organizations to implement INRMP projects:

1. The Sikes Act (16 U.S.C. 670c-1) allows the Secretary of a military department to enter into cooperative agreements with States, local governments, nongovernmental organizations, individuals and into interagency agreements with the heads of other Federal departments and agencies, to provide for the maintenance and improvement of natural resources, or to benefit natural and historic resources research, on DoD installations.
2. The Sikes Act (16 U.S.C. 670a) states that priority shall be given to the entering into of contracts for the procurement of such implementation and enforcement services with Federal and State agencies having responsibility for the conservation or management of fish or wildlife.
3. The Economy Act (31 U.S.C. 1535 and 1536) allows a Federal agency to enter into an agreement with another Federal agency for services, when those services can be rendered in a more convenient and cost effective manner by another Federal agency.
4. The Intergovernmental Cooperation Act of 1968 (P.L. 90-577 (82 Stat. 1098) allows the “improvement of the administration of grants-in-aid to the States, to permit provision of reimbursable technical services to State and local government.”
5. The “Memorandum of Understanding Between the U.S. Department of Defense and U.S. Fish and Wildlife Service and the Association of Fish and Wildlife Agencies for a Cooperative Natural Resource Management Program on Military Installations,” was signed by the parties in 2013 and provides a foundation for the military services to enter into funded interagency agreements with the Fish and Wildlife Service (Attachment 1). Where the Service has entered into these agreements, our ability to provide conservation benefits has been greatly expanded. Interagency agreements with the military are usually executed with a Military Interagency Purchase Request (MIPR).

The most prominent example of this is the Interagency Assistance Agreement between the United States Fish and Wildlife Service and the United States Air Force for the Conservation of Natural Resources on Air Force Controlled Lands (Attachment 2). The Service has entered into numerous partnerships under this agreement. They have greatly expanded our ability to provide conservation benefits at landscape scales and to better align DoD land management priorities with Service landscape conservation goals.

## **Sikes Act Reporting Requirements**

### INRMP Status Reporting

Regional Sikes Act Coordinators should notify the National Sikes Act Coordinator when an INRMP has received Service concurrence or non-concurrence. Regional Sikes Act Coordinators may notify headquarters by sending the signature page of the approved INRMP, copy of a concurrence or non-concurrence letter, or memo indicating outcomes of a review of operation and effect to the National Sikes Act Coordinator. Regional Sikes Act Coordinators should consider tracking INRMP review status to anticipate INRMP review requests from installations in their regions.

### Sikes Act Expenditures and Activities Reporting

The Sikes Act requires the Service to submit a report of the previous fiscal year's annual Sikes Act-related expenditures to Congress by March 1. The report is intended to include expenditures by the DOI and the States in support of the preparation, review, and implementation of INRMPs for DoD installations. Reportable Sikes Act-related expenditures are for projects done on and off military installations that are required by the DoD to have an INRMP. Reportable activities do not include U.S. Army Corps of Engineers, Coast Guard or projects that are not related to a specific INRMP.

The Service's Sikes Act-related expenditures must be entered into ECOS throughout the year as work is conducted with the installation. Sikes Act information may be entered in the Tracking and Integrated Logging System (TAILS) module of ECOS. ECOS is located at the website: <https://ecos.fws.gov/>. Instructions on website access and database completion are described in the section at the end of this document. All Fish and Wildlife Conservation Offices and other Fish and Aquatic Conservation program field stations must also report accomplishments in the Accomplishments Module of the Fisheries Information System (FIS) in addition to the data that must be reported in TAILS.

The Sikes Act requires that the Service's annual report include State expenditures that support Sikes Act implementation. Therefore, it is imperative that the Regions consult with the State fish and wildlife agencies to obtain the necessary expenditure information and enter it in ECOS. Memoranda issued annually by the Regional Sikes Act Coordinators can be used to help identify the types of information needed.

The Service and State fish and wildlife activities conducted for all military installations reported by the field offices should reflect Service-appropriated, State-appropriated, and DoD-provided expenditures pursuant to Sikes Act implementation. Typical activities reported by the Service include, but are not limited to the following:

- Technical assistance in planning and preparation of INRMPs or revisions;
- INRMP review and processing;

- Installation site reviews;
- Interagency meetings and public meetings;
- INRMP implementation activities, such as stocking fish and assisting with hunting days;
- Field technical assistance, such as conducting habitat assessments and fish or wildlife population surveys;
- Migratory bird, contaminants, and invasive species management;
- Wetland, grassland or other habitat restoration;
- Section 7 consultations pursuant to the ESA, and other ESA activities; and
- Cooperative conservation projects related to installations with INRMPs.

Cooperative conservation projects off installations may be reported if they are associated with an installation with an INRMP. For example, many installations participate in compatible use and landscape-level cooperative conservation projects. If a project involves several INRMPs, funds should be assigned to the lead installation or reported in part to each participating installation.

Field offices are responsible for entering data into TAILS that represent the best estimate of actual costs of Sikes Act-related activities for the fiscal year and includes:

**FWS Program Funds:** For work conducted in compliance with Sikes Act responsibilities, the field office should enter amount from FWS appropriations funds that may include salaries, administrative overhead, travel, equipment, and supplies.

**DoD Funds provided to FWS:** The field office should enter amount provided to the Service by DoD to cover salaries, administrative overhead, travel, equipment, and supplies in executing Sikes Act responsibilities.

**State Funds:** The field office should request that States provide the amount spent for salaries, administrative overhead, travel, equipment, and supplies.

**DoD Funds provided to States:** The field office should request that States provide the amount of DoD funds provided to the State(s) for salaries, administrative overhead, travel, equipment, and supplies.

Field offices should ensure that all fiscal year Sikes Act annual report data have been entered into ECOS either through TAILS by September 30 for Service data and November 30 for State data. If the TAILS system is not accessible by the field office, data should be submitted to the Regional Sikes Act Coordinator for entry in TAILS by the due date.

Regional Sikes Act Coordinators are responsible for ensuring that field offices have submitted Sikes Act data into TAILS by the above deadlines. Data entry deadlines for FIS apply to offices associated with Fish and Aquatic Conservation program (most commonly known as Fish and Wildlife Conservation Offices). Throughout the year, each Regional Sikes Act Coordinator should regularly monitor Sikes Act-related data in TAILS for accuracy using the TAILS Sikes

Act Ad Hoc report. If a listed installation no longer requires an INRMP, the Regional Sikes Act Coordinator should ask that the installation name be removed from the TAILS database. Similarly, if an installation requires an INRMP and is not listed, the Regional Coordinator should request that the installation name be added to the TAILS database.

The Service, through the National Sikes Act Coordinator, is required to submit a final annual report of fiscal year expenditures to Congress by March 1 of the following year. Regional Coordinators and field offices are encouraged to contribute relevant information to the National Sikes Act Coordinator to consider for inclusion into the annual report.

## *Addendum*

### Addressing Pollinator Conservation in INRMPS

INRMPS provide an excellent opportunity to encourage pollinator conservation on military lands. Pollinator conservation supports the military mission by helping to maintain diverse healthy ecosystems. These natural landscapes provide realistic conditions for training missions and serve as buffers for local communities. Healthy, diverse native plant communities require less active management and are more resilient to stressors. Pollinator conservation measures can further benefit the military by reducing operational and maintenance costs for management of improved areas. Conserving pollinators can enhance the morale and welfare of military personnel and their families by providing a variety of outdoor recreation opportunities.

The Service encourages evaluation of management practices with respect to pollinators during INRMPS review. Management practices that benefit pollinators may already be in place. Other management practices could be modified easily to further promote pollinators. Consider where on the installation pollinator conservation would be compatible with the military mission, as well as whether pollinator inventory, monitoring, or research would support the mission.

Make sure the Installation Pest Management Plan (IPMP) is coordinated with the INRMPS. Improper pesticide use can harm pollinators. Pest management personnel need to be aware of which areas are important for pollinator conservation. Integrated pest management (IPM) will help eliminate and reduce unnecessary pesticide use. Monitoring should be used to determine when to treat a pest problem.

Consider opportunities to educate those whose cooperation is needed to implement pollinator conservation and new base residents, obtain project funding (e.g., DoD's Legacy or REPI programs), and partner with other organizations to further pollinator conservation and science. Including these activities in an INRMPS is often a necessary first step to facilitate implementation.

A checklist is provided in below to stimulate thought and discussion on ways to support pollinator conservation. Technical information on accomplishing the items on the checklist is provided in the U.S. Air Force Pollinator Conservation Reference Guide found on <https://www.fws.gov/pollinators>.

### **Pollinator Considerations Checklist for INRMPS**

Pollinators need a variety of flowering plants from early spring through fall to provide food (nectar) for adults. Adults also may feed on pollen, plant sap, insects, fruits or seeds, depending on the species. Any actions that prevent plants from flowering (mowing, burning, heavy grazing, etc.) will impact pollinators. Different pollinators use flowers of different colors, shapes, sizes, and scents, so variety is good. Immature stages of pollinators may eat different food than adults, including leaves, seeds, fruit, insects, wood, and carrion. Specialist bees, and butterflies and moths require specific plant species for their young to develop. Some pollinators require water.

Pollinators also need places to nest and overwinter near (within a couple of hundred feet for some species) their food sources. Different species use different sites for nesting including trees, shrubs, snags, logs, plant stems, bunch grasses, open patches of well-drained, sandy or loamy soil in sunny areas, stone walls, caves, abandoned rodent nests, and nests of other insects. Many insect pollinators overwinter in the soil and leaf litter. Actions that disturb or eliminate these sites (e.g., digging in soil, removing downed wood, trimming dead plant stems, closing cave entrances, filling in abandoned rodent nests) will also impact pollinators.

Pesticides can harm pollinators. Cultural controls (changes in behavior/landscaping) and physical/mechanical controls (barriers, traps) should be implemented before resorting to chemical controls. When pesticides are used, select one that is specific to the pest, has a low toxicity to bees, a low residual time, and is in a liquid or granular formulation. A spatial buffer between the area of application and pollinator conservation areas is best, otherwise, use a temporal buffer, and apply pesticides when pollinators are absent. Target pesticide applications, by applying when winds are low and using spot treatments or backpack sprayers.

Use the following checklist to stimulate thought and discussion. Items below are strongly encouraged, but most are not required. More information on how to accomplish each is in the U.S. Air Force Pollinator Conservation Reference Guide (RG), where indicated. This guide can be found at: <https://www.fws.gov/pollinators>

**Endangered/threatened pollinators, pollinators designated Birds of Conservation Concern, and monarch butterflies** (RG Sect. 1)

- Have pollinators of conservation concern that occur on the installation been identified?
- Are priority conservation areas identified in cooperation with partners?
- Are actions identified to reduce threats/improve habitat for these species?

**General habitat management** (RG Sect. 2A, 2B1 and 2B6)

- Have areas been identified where pollinator habitat conservation is compatible with the installation mission (pollinator habitat conservation areas)?
- Are native forbs considered for and included in seed mixes when available?
- Are several species of native flowering plants available from early spring through fall?
- Are pollinator nesting and overwintering sites (open soil, downed wood, bunch grasses, leaf litter, abandoned rodent nests, etc.) available?
- Are there opportunities to connect patches of pollinator habitat?
- Are land management practices compatible with pollinator conservation? (See **Land Management** section below)
- Is integrated pest management (IPM) implemented to reduce risks to pollinators and their habitat from pest control activities? (See **Pest Management** section below)
- Is the spread of invasive species reduced/prevented (e.g., clean equipment, work first in areas without invasive species)?
- Are invasive species being removed/controlled using pollinator-friendly methods (e.g., mechanical controls, legal biocontrol organisms, reduced/modified chemical use to minimize impacts, etc.)?

### **Pest Management** (*RG Sect. 3*)

- \_ Is the Installation Pest Management Plan (IPMP) coordinated with INRMP?
- \_ Have pest management products (including pesticides) and practices been reviewed to determine if they may harm pollinator? If determined harmful, have they been replaced/reduced using IPM?
- \_ Is monitoring used to determine when to treat pest problems?
- \_ Are cultural controls (changes in behavior/landscape) the first line of defense against pests? Could they be used more frequently?
- \_ Are physical/mechanical controls (e.g., barriers, traps, etc.) used where feasible?
- \_ Are biological controls available, and if so have they been considered?
- \_ Is toxicity of the pesticides used minimized (e.g., specific to the pest, minimum risk, low acute toxicity to bees – See *RG*, Tables 11 and 12)?
- \_ Are pesticide formulations liquid or dust and non-systemic?
- \_ Is exposure of pollinators to pesticides reduced (e.g., use low persistence pesticides, place buffer around pollinator conservation areas, apply when winds are low and pollinators are absent, use spot treatments or backpack sprayers)?
- \_ Have local beekeepers been identified for those times when it may be necessary for an expert to remove honey bee hives located in/near buildings and swarming honey bees?

### **Outreach** (*RG Sect. 4*)

- \_ Do natural resource and pest management personnel need training in pollinator conservation?
- \_ Are programs/materials about the importance and methods of pollinator conservation available for new installation personnel and their families?
- \_ Have natural resource staff planned or implemented outreach to personnel (e.g., leadership, pest management personnel, outdoor recreation staff, landscaping crews, etc.) whose approval/assistance will be needed to help conserve pollinators? If not,
  - Have goals and key messages been identified for target audiences?
  - Has an outreach implementation strategy, including needed products and a means to produce them, been identified?
  - How will effectiveness be evaluated?
- \_ Are existing programs (e.g., National Public Lands Day) used to increase public awareness about pollinators and their conservation?

### **Partnerships** (*RG Sect. 5*)

- \_ Are there opportunities to partner with adjacent/nearby landowners (especially public agencies) to conserve pollinators of conservation concern?
- \_ Could pollinator conservation projects be accomplished with volunteers for National Public Lands Day?
- \_ Are there pollinator conservation projects that would qualify for Legacy Program funding?
- \_ If REPI projects are underway, are measures to conserve pollinators being incorporated in off-installation conservation plans where compatible?



- \_ Are there opportunities to partner with other organizations to expand pollinator science or conservation?

### **Land Management**

#### **1. Grounds Maintenance** – Landscaping/ROWs (*RG Sect. 2B1&2*)

- \_ Are native flowering plants used where possible?
- \_ Is habitat provided for pollinator nesting and overwintering (e.g., naturally occurring open patches of soil, downed wood, bunch grasses, leaf litter, etc.)?
- \_ Can mowing/brush hogging be delayed until after flowers have bloomed and set seed? If not, can mowing be staggered to maintain some floral resources at all times?
- \_ Is blade height set to 10-16 inches, except for lawns?
- \_ Are invasive species being removed/controlled?
- \_ See **Pest Management** section above.

#### **2. Recreation Areas** (*RG Sect. 2B1*)

- \_ Could native flowering plants be planted in/around recreation areas?
- \_ Are pollinator nesting and overwintering habitat provided in/around recreation areas?
- \_ Are pollinator education programs provided for military families?

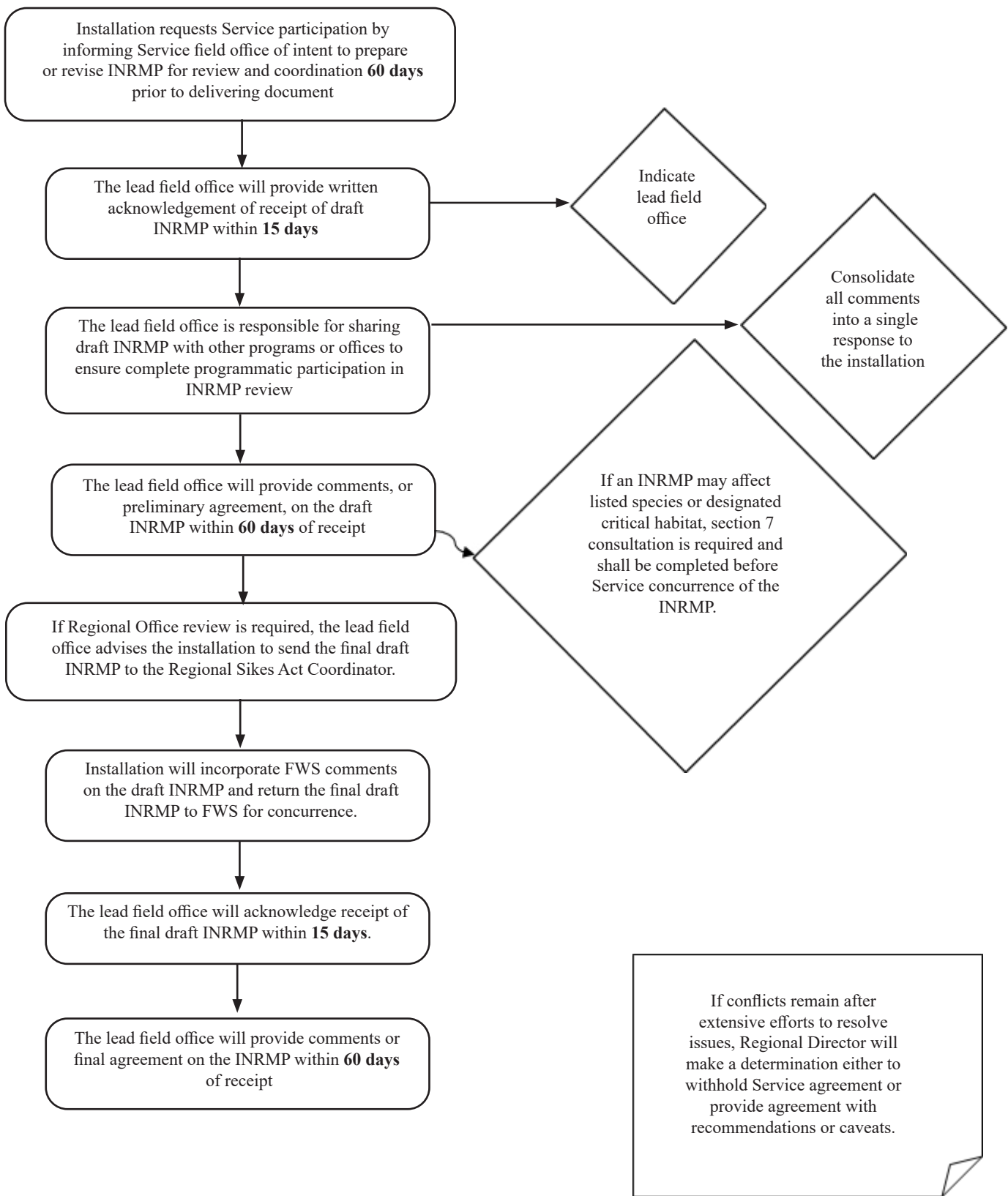
#### **3. Forest Management** (*RG Sect. 2B3*)

- \_ Are non-native trees and shrubs replaced with native trees and shrubs?
- \_ Are openings in the forest maintained or created for native flowering plants?
- \_ Within the openings, is there habitat for pollinator nesting and overwintering (e.g., open patches of soil, downed wood, bunch grasses, leaf litter, etc.)?
- \_ See **Pest Management** section above.

#### **4. Prescribed Fires** (*RG Sect. 2B4*)

- \_ Are all pollinators of conservation concern present in burn units identified on the sensitive species checklist? Are their needs considered in the timing of prescribed fires?
- \_ Is the burn size small enough relative to the surrounding habitat so that pollinators are able to recolonize (typically less than 30%)?
- \_ Is there enough time between prescribed fires for pollinator populations to recover or reestablish?
- \_ Are burns scheduled when fuel conditions promote a mosaic pattern of burned and unburned habitat?
- \_ Can high intensity burns be avoided while meeting management goals?

Figure 1. Fish and Wildlife Service Process for INRMP Review and Approval



*Attachment 1*

Memorandum of Understanding Between the U.S. Department of Defense and  
U.S. Fish and Wildlife Service and the Association of Fish and Wildlife Agencies  
for a Cooperative Natural Resource Management Program on Military Installations

*Attachment 2*

Interagency Assistance Agreement between the United States Fish and Wildlife Service and the United States Air Force for the Conservation of Natural Resources on Air Force Controlled Lands