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To: State Directors (California, Colorado, Idaho, Montana/Dakotas, Nevada, Oregon/Washington, Utah, and Wyoming), and Center Directors

From: Deputy Director *Steven F. Elkin*

Subject: Process for Assessing, Coordinating, and Implementing Greater Sage-Grouse Land Use Plan Adaptive Management Hard and Soft Triggers

DD: February 1 of each year

Program Areas: Resources and Planning, Minerals and Realty Management, and Communications

Purpose: This Instruction Memorandum (IM) directs the implementation of the land use plan adaptive management process to evaluate and apply hard and soft triggers and responses, as detailed in the Greater Sage-Grouse (GRSG) Approved Resource Management Plans and Amendments (GRSG Plans), Great Basin and Rocky Mountain GRSG Regional Records of Decision (ROD) (September 21, 2015).

Policy/Action: The GRSG Plans state that specific hard and soft trigger data (refer to the Adaptive Management Plan within each GRSG Plan) will be analyzed in accordance with the GRSG Plans, as soon as it becomes available after the signing of the ROD and then, at a minimum, analyzed annually thereafter.

In the event of a significant habitat or population loss due to disasters such as wildfire, the loss data should be analyzed as soon as possible after the event occurs. Each Bureau of Land Management (BLM) State Office will evaluate its GRSG adaptive management triggers in accordance with the applicable land use plan, including the appropriate coordination as described in that applicable land use plan, as soon as possible. In addition, the following steps will provide a framework and timeline to support a coordinated evaluation and notification process across the BLM.

Step 1 - Analysis: Bureau of Land Management (BLM) State Offices, in coordination with partners (as described in the GRSG Plans), will use the processes and formulas outlined in the applicable GRSG Plan to evaluate population and habitat data to determine if the GRSG Plan's adaptive management soft and hard triggers have been exceeded. This step would occur prior to the end of each calendar year (December 31) and after such time that habitat data and population data from the state is available as set forth in the Greater Sage-Grouse Population Monitoring Memorandum of Understanding (MOU) between the Western Association of Fish and Wildlife Agencies (WAFWA and USDO/BLM, 2015). In the event of a catastrophic loss of population or habitat (e.g., wildfire) that is likely to exceed a hard trigger, the BLM will analyze the data as soon as practical and at the latest by the end of the calendar year (December 31). Coordination among technical specialists from appropriate state and federal agencies may be necessary to validate the analysis based on the process outlined in the applicable GRSG Plan. BLM, in consultation with federal, state, county or tribal governments, where appropriate, will make a finding that a trigger (both hard and soft) has or has not been tripped before proceeding to Step 2. For triggers that include multi-year trends, such as population trends, the BLM state offices should use the most recent available data as the end point for the range, going back the necessary number of years, unless otherwise specified in the GRSG Plan. For example, for initial evaluation in 2016, if there is a 5-year population trend trigger, analyze 2011-2015 data.

Where the state office has information that indicates that a hard or soft trigger may have been exceeded, it will immediately notify district and field offices as well as adjacent state, district and field offices. Affected offices should consider whether approval of pending authorizations within the affected adaptive management response area would exacerbate the trigger or would otherwise be inconsistent with the trigger responses set forth in the applicable GRSG Plan. Once a finding has been made that a trigger has been exceeded, the responses will be implemented as set forth in the applicable GRSG Plan and Steps 2 through 5 will be followed.

Step 2 - BLM Washington Office Notification: State Directors will provide a report summarizing the results of the analysis conducted in Step 1 to the Assistant Directors for Resources and Planning (AD-200), Minerals and Realty (AD-300) and Fire and Aviation (FA-100) by February 1 of the following year. Specifically, this report will identify whether soft and/or hard triggers were exceeded and, if any triggers were exceeded, which soft and/or hard triggers have been exceeded, the areas where this has occurred, the appropriate hard trigger responses if a hard trigger was exceeded (as outlined in the applicable GRSG Plan), and a summary of the process to conduct the causal factor analysis where such an analysis is required.

Step 3 - Federal, State, County and Tribal Partners Notification: Within two weeks of completing Step 2, State Offices will notify Federal, State, County, and Tribal partners of the results from the analysis conducted in Step 1 (recognizing that some of these partners may have been involved during Step 1). Appropriate regional coordination may be initiated at this step to discuss responses and timelines.

Step 4 - Field and District Office Outreach and Public Notification:

- a. Field/District Outreach: Each State Director will issue guidance to the Field/District Managers regarding the soft and/or hard trigger(s) that have been exceeded and the appropriate responses (as outlined in the applicable GRSG Plan).

- b. **Public Notification:** Coinciding with the release of the guidance to the field/district, the BLM State Office will notify the public through a news release regarding any soft and/or hard trigger(s) that has been exceeded and the appropriate responses, if known, that will be implemented (as outlined in the applicable GRSG Plan).
- c. Completion of this step would occur at some point after Step 3 and far enough in advance of Step 5 (typically by May 1) to provide the necessary information for that news release.

Step 5 - Washington Office Press Release: By June 1, AD-200 will publish an annual range-wide adaptive management summary through a news release.

Timeframe: This Instruction Memorandum (IM) is effective immediately.

Budget Impact: There is an increased workload associated with implementing the GRSG Plans. The increased workload must be accommodated within existing budgets at the field, district, and state office levels, and may result in not accomplishing targets or the deferral of accomplishments in other program areas through redirection of existing funding.

Background: The GRSG Plans included GRSG habitat and population triggers and associated responses. Each GRSG Plan generally contains both soft and hard triggers and associated responses to address population and habitat changes. When hard triggers are exceeded each GRSG Plan provides for specific plan-level responses to be instituted. A causal factor analysis may also be necessary to determine the cause of the hard trigger being tripped. When soft triggers are exceeded, more conservative or restrictive conservation measures will be implemented on a project-by-project basis, and an additional evaluation to determine cause will occur, as described in each GRSG Plan, in order to determine appropriate responses. The habitat and population triggers and responses are specific to each GRSG Plan; State Offices should carefully review their GRSG Plans regarding triggers and responses.

Manual/Handbook Sections Affected: None.

Coordination: Preparation of this IM was coordinated with the Greater Sage-Grouse Implementation Team, Western State Governments, U.S. Forest Service and U.S. Fish and Wildlife Service.

Contact: If you have any questions regarding this IM, please contact Leah Baker, Division Chief for Planning, NEPA, and Decision support (WO-210), (202) 912-7282.