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To: State Directors, CA, CO, ID, MT/Dakotas, NV, OR, UT, WY

From: Assistant Director, Resources and Planning

Subject: Process for Evaluating Greater Sage-Grouse Land Use Plan Adaptive Management Hard and Soft Triggers

DD: Annually

Program Areas: 200, 300, and 600 Program Areas.

Purpose: This Instruction Memorandum (IM) provides direction and guidance on the implementation of the adaptive management process to evaluate and apply hard and soft triggers and responses, as detailed in the 2015 Greater Sage-Grouse (GRSG) Approved Resource Management Plans and Amendments (GRSG Plans) Great Basin and Rocky Mountain GRSG Regional Records of Decision (RODs) (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 habitat and population data becomes available after the signing of the ROD and then, at a minimum, analyzed annually thereafter.

As soon as practicable and on an annual basis, each Bureau of Land Management (BLM) State Office (SO) will analyze specific hard and soft trigger data and determine if an adaptive management trigger has been exceeded. This will be done in coordination with federal, state, and local partners, as described in the applicable land use plan. Each BLM SO will implement the following steps to provide for a coordinated evaluation and notification process across the BLM. This IM supersedes IM 2016-140.
**Step 1 - Establishing a Baseline Trigger Analysis:** In coordination with appropriate federal, state, and local partners, BLM SO 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 should occur as soon as practicable after habitat and population data from the state is available. In addition, as soon as practicable, state offices should analyze data relating to any catastrophic loss of population or habitat, such as damage caused by wildfire, that is likely to exceed a hard trigger. 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. The BLM will make a finding to determine whether a hard or soft trigger has been exceeded before proceeding to Step 2.

When the state office has information that indicates a hard or soft trigger may have been exceeded, it will notify the appropriate district and field offices as soon as possible. If a hard trigger has been exceeded, the hard trigger responses set forth in the applicable GRSG Plan will be implemented. The 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. The state office should also notify the Washington Office through the normal early alert process when a hard trigger has been exceeded and hard trigger responses are being implemented.

**Step 2 - Initiate Causal Factor Analysis Including the Identification of Trigger Responses:** Once a finding has been made that a hard trigger has been exceeded, the BLM State Office (and/or appropriate district and field office), in coordination with federal, state and local partners, will initiate a causal factor analysis process, as defined in the applicable land use plan. This analysis should determine the possible or probable cause(s) of the population and/or habitat decline or lack of a positive population response to favorable environmental conditions. Responses will be implemented by state, district and/or field offices as set forth in the applicable GRSG Plan. In some cases, the appropriate response may not be addressed in the applicable GRSG Plan. In this situation, a plan amendment or NEPA analysis of an implementation action may be required before implementing new or different responses.

**Step 3 - BLM Washington Office Notification:** State directors will provide an annual report summarizing the results of the analysis conducted in Steps 1 and 2 to the Assistant Directors for Resources and Planning (AD-200), Minerals and Realty (AD-300) and Fire and Aviation (FA-100). This report will identify any soft or hard triggers that 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 that is being used to conduct the causal factor analysis.

**Step 4 - Internal and External Notification:** Within two weeks of completing Step 3, state offices will notify the appropriate federal, state, county, and tribal partners, as well as impacted
district and field offices of the results from the analysis conducted in Steps 1 and 2. Additional regional coordination may be initiated at this step to discuss responses and timelines. As noted in Steps 1 and 2, federal, state, county, and tribal partners, as well as staff from local district and field offices should already be aware of the conclusions from the analyses conducted in Steps 1 and 2 based on their participation. This step provides notification to local BLM staff and all partners.

**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 will determine the cause of the trigger being tripped. When soft triggers are exceeded, more conservative or restrictive conservation measures may be implemented on a project-by-project basis. 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) at (202) 912-7282 or by email at lbaker@blm.gov.