

## **A Discussion of Adaptive Management and the Little Snake RMP Revision: A Way Forward?**

### Background:

As we've been discussing in past NWCOS meetings, BLM is encountering difficulties in integrating AM in a land use plan. However, as I think more about this issue, I see how we could possibly describe a process for utilizing AM at the implementation level, or project level. According to the Land Use Planning Handbook, land use plan decisions are broad-scale decisions which guide future land management actions and subsequent site-specific implementation decisions. Implementation decisions generally constitute the BLM's final approval allowing on-the-ground actions to proceed. These types of decisions require site-specific planning and NEPA analysis (typically Environmental Assessments or EAs). Implementation level decisions are synonymous with activity-level and project-level decisions.

Let's look at the OEPC definition of AM:

Adaptive management is a system of management practices based on clearly identified outcomes, monitoring to determine if management actions are meeting outcomes, and, if not, facilitating management changes that will best ensure that outcomes are met or to re-evaluate the outcomes (OEPC ESMO3-6).

Although BLM has built in several processes to provide flexibility for the bureau as well as resources users (outlined in Appendix X and XX), I have said before that we are not using AM in its traditional, pure form as described above. NWCOS seems to agree. A more traditional approach might be what Jeff and Ann described about what their sectors were looking for in an AM framework.

### Adaptive principals already integrated into Draft Alternative C:

There are currently two processes outlined in Alternative C that provide for some flexibility or adaptability. There seemed to be some real misperceptions during the October NWCOS meeting about how this Appendix would work. It is true that our strategy is to first prescribe a stipulation, THEN to remove it after looking at the situation on the ground. Jeff showed the group how his sector would like it handled—to allow for a creative, adaptive solution first, then apply the prescription if needed. (This is why during some meetings I say we are not using “true” adaptive management in this plan, but our strategy does allow for much flexibility). From the ID team's perspective, on the ground there is no difference between how these two strategies would be implemented. Jean Stetson brought up an example about a well proposed over the hill from a sage grouse lek. LSFO heartily agrees that the time to work out the specifics is in the field where we can talk about creative solutions, and Appendix X is set up to address this exact situation.

For every permitted activity, including Applications for Permit to Drill (APD), we do an on-site with BLM resource specialists. At this point, we look at all the factors on the ground that would

warrant protection (e.g., is the project proposed within nesting habitat within 4 miles from a lek? What time of the year is it? Would a timing restriction apply?) Our specialists and specialists from the operators would also look at the criteria for granting exceptions to that stipulation (e.g., are there topographical factors that would screen the lek? Are other things an operator could do, on site or off site, which would mitigate the impacts? What is the extent of the proposed project?). This is one time for creative solutions to be worked out between the user and the BLM. BLM doesn't think of it in terms of which is first when the on-site happens—the prescription or the creative solution. The process and the result would be the same.

The intent of Appendix XX is to tell BLM when to perform site-specific implementation planning to address an issue or concern. It is easier for BLM to deal with specific issues at the implementation level. In fact, after the ROD is signed, besides amending the RMP, activity-planning is the only place where we can make the management changes AM requires. Therefore, Appendix XX is meant to be a gauge for issues and problems that arise throughout the life of the RMP. When specified criteria are met, site specific planning is triggered and changes in management can be made. This Appendix essentially defines when an issue needs to be kicked to implementation planning in order to address that issue.

#### BLM issues with Wildlife Habitat/Ecosystem sector's approach:

During the November 9 NWCOS meeting, the Wildlife Habitat/Ecosystem sector outlined some concerns with the BLM's adaptive approach and did a good job lining out some ways to address these concerns. Because BLM and BAH have explored the issue of AM extensively in our work meetings, we have discussed this proposal as well. BLM sees several issues with this approach:

Defining every single indicator and trigger to be used for every possible project in every possible setting is unreasonable and infeasible. Describing each type of project proposed in each ecosystem type in the planning area and quantifying each indicator and trigger would turn into literally hundreds of possibilities—details too intricate for a RMP. Look at the criteria in Appendix X and imagine having to quantify each one of those for each possible situation. Then what about different combinations of those criteria? I hope you can see the complexity here. Besides, aren't indicators and triggers more appropriate if they're tailored to a specific proposed project? And how will the BLM deal with changing science? It concerns BLM to define science-based indicators and triggers in a land use plan which spans 20 years. In addition, if we have to define exactly what action we would take in any circumstance, it takes away all the flexibility and adaptability it is meant to provide on a case-by-case basis. Defining all this is the opposite of addressing specific projects on a case-by-case basis and severely limits creative on-the-ground solutions.

#### Reasons why AM is more easily handled at implementation level instead of RMP-level:

This section describes some of the difficulties BLM has encountered in designing adaptive decisions in the RMP and implementing a landscape-scale, "allow for AM first, then prescription" strategy in the RMP. I also discuss how many of these concerns would be lessened at the implementation level.

1. RPM decisions are land allocation decisions, goals and objectives and allowable uses decision. These broad, often non-specific, over-arching type decisions are difficult to fit into an adaptive framework because it is difficult to define specific measurable outcomes, indicators and triggers for these types of broad decisions.

2. Oil and gas stipulations **must** be attached to a lease at time of sale. They cannot be put on later, after BLM realizes this stip is needed after a create solution fails to achieve an outcome. This is non-negotiable: BLM will put all appropriate stipulations on that lease, regardless of an AM plan. However, this does not necessarily exclude the use of AM at the APD stage. After a project-specific AM plan was drafted and a creative solution was agreed upon, an exception could be granted.

3. In order to craft RMP-level decisions into AM decisions in the land use plan, BLM would have to ensure funding for monitoring would be available. This is a criterion in the AM Filter and if AM is to work, BLM monitoring **must** occur regularly. Unfortunately, it is not possible for BLM to guarantee money for large-scale, landscape scale monitoring in the RMP. However, talking about how to pay for monitoring for a specific project is more reasonable, since we can talk about who pays, how long the process will take, how many times indicators will need to be monitored, etc.

4. There are some resources and values that the BLM feels are inappropriate for AM. We do not believe that in every case we can just chalk it up as a failure and move on without consequences. Some resources are irreplaceable. For example, if we were to try AM process for a project that might affect Gibben's Beardtongue and our approach was to fail, we would lose that occurrence; there is no way to replace it. Situations where AM should not be used should be defined as well as possible in the RMP, but not every single situation can be discussed. A good way to determine if a specific project would be applicable to AM if it's not specifically addressed in the RMP is to apply the AM Filter at the implementation stage. BLM has not had the chance to discuss exactly where AM would be appropriate, so I cannot say them here without some core team discussion. I am a planning coordinator, not a resource specialist. However, areas that I would guess may be off limits to AM might be WSAs, ACECs, Wild and Scenic Rivers segments, T&E and candidate species, and some special status species. This warrants more discussion.

5. Monitoring many indicators on a landscape scale is infeasible and unimpractical, regardless of potential money for monitoring. If we were to try to create a wide-open AM strategy in the plan, the complexity could easily start to overwhelm the process. For APDs we would have to monitor a huge list of indicators. Add to that all the indicators we would need to monitor for other projects such as prescribed burns, range improvements, travel management plans, etc. Soon we would be required to monitor dozens of indicators at intervals that are out of the question for a normal staff. Plus, without knowing the specific proposed projects/actions, how are we to know what indicators are necessary? What will the thresholds/trigger points be? Won't this depend on current science? Utilizing an AM plan at the project level enables us to use the best science, even when the RMP is 10 years old. How much money will be needed for monitoring? We will not know this for sure until we determine the indicators, triggers, lifespan

of the project, and frequency of monitoring. This problem is described above in the context of the Wildlife Habitat sector's AM comments.

6. Closing the loop and learning from AM is difficult to do in an RMP. Integration of new knowledge would not be feasible until another RMP revision. However, at the implementation stage, lessons learned can be incorporated into future projects.

### A Way Forward?

The idea is, because we are finding it very difficult to incorporate AM into land use plan decisions, we discuss how it will be used at the activity level. Maybe the best to address AM in the RMP is simply to describe the process we will utilize at the activity stage. It might look something like this:

In an AM process appendix or a section of the alternatives, first define Adaptive Management. Then describe the AM process for implementation-level decisions. It might look something like this:

1. BLM/user asks: Is this proposed action which is suitable for AM? Apply the AM Filter to make this determination. Plus there maybe some additional instances where BLM can put AM off limits (WSAs, ACECs, etc). These should be defined in the RMP.
2. If the Filter says it's appropriate, develop an Adaptive Management Plan, which will be approved by BLM (and the applicant?). The AM Plan will answer the following questions:
  - What is the desired outcome we wish to achieve? (Based on goals and objectives in RMP as well as project specific goals and objectives and current science).
  - What are the indicators and triggers? These will be measurable decision points specific to this project!
  - What is the monitoring plan? Funding must be committed, as per Filter. If it is not committed before this stage it, a no-go. If something were to go wrong with funding, the BLM would have to fall back to a prescription, which raises some issues (it's too late to move the well pad, for example). The monitoring plan will describe how often monitoring will take place, the methods to be used, the participants in the process, and how the monitoring will be paid for.
  - Close the loop—what is learned and how can we apply it? BLM should keep records and could apply this new knowledge to similar situations.
3. Anything else about the process. Who makes decisions, who gets to participate, etc. Finally, we could show an example of how this might work in the field.

The trick here is, how do we anchor this process in the RMP allow us to do AM at the project level? This approach also leaves a few outstanding questions: How does this related to Appendix X? Would this simply turn into a typical EWM appendix or still an aspect of our overarching AM plan? How would Appendix XX change under this strategy? Could these processes actually serve as the anchors? Another issue with this approach is that land use

allocation decisions and allowable uses decisions (RMP-level decisions) will not be subject to AM—only activity level decisions would be. Maybe there is a way to allow for change in RMP allocation decisions without doing a plan amendment.