

9.0 INRMP IMPLEMENTATION AND EVALUATION

9.1 INRMP Implementation

MCAS Miramar's natural resource management program will seek appropriate funding and set priorities based on actual funding received. Implementation of planned actions and projects is a requirement of the Sikes Act, which directs the development and implementation of INRMPs.

This INRMP will be considered implemented when MCAS Miramar:

- actively requests, receives, and uses funds for USMC Common Output Levels of Service (COLS) Level 3 Projects and activities;
- ensures that sufficient numbers of professionally trained natural resources management personnel are available to perform the tasks required by the INRMP;
- coordinates annually with all cooperating offices; and
- documents specific INRMP action accomplishments undertaken each year (USMC 2007).

9.1.1 Implementation Metrics

According to Marine Corps INRMP Manual (USMC 2007), "*Conservation metrics are a DoN [Department of Navy] requirement developed to better demonstrate how well installation conservation programs support the military mission. The metrics builder provides Marine Corps natural resource managers a consistent method to accomplish and document annual INRMP reviews and provide the Marine Corps the additional metrics they desire to better monitor the health of the conservation program, its impacts on the installation mission, and the successful partnerships with the USFWS and state Fish and Wildlife agencies with whom the Marine Corps develops and implements INRMPs.*"

Key focus areas are INRMP implementation, partnership effectiveness, INRMP team adequacy, impact on the mission, status of federally listed species and habitat, ecosystem integrity, and fish and wildlife management and public use. Objectives of key focus areas are as follows (USMC 2007):

1. Assessment of INRMP Implementation. Determine if INRMP projects are properly developed and entered into the system for resourcing. Document funding received, projects accomplished, and whether they meet expectations.
2. Assessment of Listed Species and Critical Habitat. Determine if conservation efforts are effective, ensure that SAR are successfully identified and steps are taken to preclude listing, and determine if the INRMP provides conservation benefits necessary to preclude designation of critical habitat.
3. Assessment of Partnership Effectiveness. Determine if the partnership among the INRMP team is cooperative and resulting in the effective INRMP implementation.
4. Assessment of Fish and Wildlife Management and Public Use. Rate availability of public recreational opportunities, such as fishing and hunting, given installation security requirements.
5. Assessment of Team Adequacy for Natural Resources Management. Determine if the Natural Resources Team is adequately supported and appropriately trained to implement INRMPs.
6. Assessment of Ecosystem Integrity. Determine the integrity of various installation habitats through the development of a simple protocol, using "indicator species" or possibly by reviewing the team's subjective reasoning and consensus.
7. Assessment of INRMP Impact on the Installation Mission. Measure the level to which existing natural resources compliance requirements and associated actions support the installations' ability to sustain the current operational mission.

9.1.2 INRMP Implementation Responsibility

The Environmental Management Department, Natural Resources Division for MCAS Miramar is responsible for implementing this INRMP. The Natural Resources Division provides program oversight for natural and cultural resource compliance and management on the Station. Division activities include:

- planning for and accomplishing established goals, objectives, and planned actions to support the ongoing military mission of the Station;
- providing technical guidance regarding vegetation management, soil conservation, management of Special Status Species, wetland conservation, fish and wildlife management, outdoor recreation, cultural resource protection, and environmentally-related GIS data management;
- providing technical advice on military and non-military NEPA documents, facility planning, construction plans, maintenance activities, military operations, and other proposed actions that may affect natural and cultural resources;
- using in-house staff, Natural Resources Division-managed contracts, and cooperative agreements to conduct fieldwork, surveys, and inventories to provide specific information about the flora and fauna on MCAS Miramar and proactively maintain up-to-date resource data for activity and project planning;
- serving as the planning lead and addressing natural resource compliance issues such as wetland and endangered species regulatory requirements;
- providing natural and cultural resources management support to Station action proponents regarding compliance requirements and BMPs; and
- providing conservation education to military and civilian personnel to raise awareness and improve community relations, with the goal of preventing resource damage.

9.1.3 Command Support

MCO 5090.2 (para.11200.1a) states, “*Natural resources stewardship is an important and identifiable responsibility of command to maintain use of Marine Corps lands for mission requirements. Each installation shall establish procedures to ensure commanders on the installation are aware of:*

- (1) The condition of natural resources available to them;*
- (2) Any installation INRMP objectives and requirements applicable to them; and*
- (3) Any foreseeable or actual conflicts between their proposed actions and any installation INRMP objectives and requirements.”*

Command support is essential to implementation of this INRMP. Many natural resources management projects within the next five years require command support. The Commanding Officer is liable for noncompliance with environmental laws, and thus has a personal interest in ensuring that this INRMP is properly implemented.

This INRMP has the support and dedication of the Commanding Officer and other command personnel who are needed to implement this INRMP, as required by the Sikes Act and other federal laws. Command is also dedicated to maintaining and improving the military mission at MCAS Miramar; implementation of this INRMP will help achieve that goal.

9.1.4 Funding Priorities for INRMP Implementation

DoD Instruction 4715.03, Enclosure 4, defines programming and budgeting priorities for DoD’s natural resources management programs. Projects are entered into the USMC Status Tool for Environmental Programs (STEP) budget system and are described in a standard format as a means of monitoring overall INRMP implementation. Projects are either classified as COLS Level 3 (*core requirements*), COLS Level

2 (*core but not critical*), or COLS Level 1 (*enhancements*). Definitions of each COLS level are provided below.

COLS Level 3. Core requirements of the natural resources program are necessary to maintain compliance with required conservation laws, regulations, Executive Orders, Final Governing Standards, and policies. COLS Level 3 projects are critically important to support Station operations and must be implemented as programmed to consider the INRMP implemented successfully. COLS Level 3 projects could involve actions necessary to rehabilitate or prevent resources degradation that may affect military readiness, including maintaining administrative, personnel, and other costs associated with managing DoD Natural Resources Conservation programs. COLS Level 3 projects could also implement management actions for federally listed threatened or endangered species, proposed federally listed threatened or endangered species, candidate species, proposed critical habitat on the installation, or court-ordered requirements to prevent the listing of species or habitat that would affect military readiness. COLS Level 3 projects are needed because an installation is currently out of compliance, or will be out of compliance in the current program year.

COLS Level 2. Additional core program projects that have lower risks associated with non-completion and are not critical to direct support of the military mission. COLS Level 2 projects could include best management practices or be related to addressing future compliance and policy requirements. Projects are designated as COLS Level 2 if the installation is not currently out of compliance, but will be out of compliance at an established deadline beyond the current program year.

COLS Level 1. Additional projects that enhance the program, promote sustainability opportunities, and conservation of environmental assets. Similar and more so than COLS Level 2, COLS Level 1 projects are not critical to direct support of the military mission. COLS Level 1 projects enhance conservation resources or the integrity of the installation mission, or are needed to address overall environmental goals and objectives, but are not immediate nor specifically required under regulation or executive order (*e.g.*, community outreach, educational and public awareness projects, management or surveys for candidate species for listing, natural resources restoration when no compliance requirement, volunteer program management).

COLS Level 3 projects include those required to:

- meet USFWS special management criteria for threatened and endangered species management;
- provide for qualified natural resources personnel; and,
- prevent resource loss or degradation (*e.g.*, soil loss, other maintenance activities) that may affect military readiness (USMC 2007).

Formal adoption of an INRMP by the installation commander constitutes a commitment to seek funding and execute, subject to the availability of funding, all COLS Level 3 projects in accordance with specific timeframes identified in the INRMP. Under the Sikes Act, any natural resources management activity that is specifically addressed in the plan must be implemented (subject to availability of funds). Failure to implement the INRMP is a violation of the Sikes Act and may be a source of litigation (USMC 2007).

COLS Level 2 and COLS Level 1 projects are identified for implementation as funding permits, and may be delayed for a year or more before such delay could cause a management problem.

9.1.5 Project Details and Summary

Individual projects have been developed to meet the objectives of the INRMP as discussed in Chapter 7. Projects addressed in this INRMP are presented in Appendix E and can be used to monitor the effectiveness of natural resources management at MCAS Miramar.

Appendix E contains a list of planned COLS Level 3 projects. A major aspect of INRMP implementation is whether or not MCAS Miramar actively requests, receives, and uses funds for COLS Level 3 projects. The year identified for any given planned project is the year for which funding is programmed.

Appendix E also contains a list of COLS Level 2 and COLS Level 1 projects. These projects and actions are not required to be implemented to achieve INRMP implementation status, but they are an important component of this INRMP. While Appendix E includes an implementation schedule, implementation of these projects are subject to available funding.

9.1.6 INRMP Implementation Funding Sources

MCO 5090.2 (para. 11200.8a) states, “*Installation commanders shall ensure natural resources management funding is included within their installation Program Objective Memorandum submittals. Funds from other sources (e.g., agricultural outleasing, forestry, and hunting and fishing user fees) may also be available to supplement natural resources management program funding. Installations should not rely on other funding sources, however, because their availability fluctuates and is beyond DOD control.*”

The USMC STEP budget system provides the primary means for identifying current and projected budget requirements needed to execute the MCAS Miramar natural resources program and achieve implementation of this INRMP. Below are the primary sources of funds (Operations and Maintenance, Centrally Managed Environmental Program, and Agricultural Outlease Income) available to MCAS Miramar.

The USMC budgetary process requires requests for funding as far as seven years in the future. Thus, MCAS Miramar budgets for natural resources management from 2018 through 2022 are already in the system. However, these budgets are periodically updated, so they are sufficiently flexible to meet emergent requirements and needs.

The following statement is required in all Marine Corps INRMPs (USMC 2004). “*All actions contemplated in this INRMP are subject to the availability of funds properly authorized and appropriated under federal law. Nothing in this INRMP is intended to be nor shall be construed to be in violation of the Anti-Deficiency Act, 31 USC §1341.*”

Operations and Maintenance Funds

Certain projects within this INRMP are either partially or fully funded with Operations and Maintenance funds, termed Operations Budget (OPBUD). OPBUD projects are typically recurring requirements to maintain services and high priority monitoring programs (e.g., labor costs); however, each project may not be required every year (e.g., the INRMP must only be reviewed/revised every five years). These locally controlled funds have more flexibility than centrally managed environmental funding, but compete with other installation needs for priority. OPBUD funds provide means for achieving projects at all COLS Levels.

Appendix E, Table E.1 lists projects for which OPBUD funding is programmed for INRMP implementation.

Centrally Managed Environmental Program Funds

The Centrally Managed Environmental Program (CMP) funds are a special subcategory of Operations and Maintenance funds. They are set aside by the USMC for new, emerging requirements, immediate environmental compliance needs, or funding requirements with no other available funding source.

Appendix E, Table E.1 lists projects for which CMP funding is programmed for INRMP implementation.

Agricultural Outlease Income Funds

Administrative expenses of agricultural outleasing may be funded with income from the outlease. These expenses are limited to direct supervisory, technical, clerical, legal, and accounting costs wholly attributable to agriculture leasing. This process includes initiating new leases and administering existing leases. Authorized items that may be reimbursed by outleasing funds, in priority order, are as follows (MCO 5090.2, para. 11201.7):

- a. costs, including personnel-related expenses, that are directly attributable to agricultural and grazing program management;
- b. costs of developing and implementing the INRMP, and supporting natural resources management programs;
- c. costs of improving or rehabilitating agricultural outlease land and natural resources to enhance agricultural productivity;
- d. costs of improving or rehabilitating land and water resources for soil and water conservation;
- e. costs of improving land and water resources for enhancing fish and wildlife habitat;
- f. costs of improving land and water for outdoor natural resources recreational use;
- g. costs of travel and training to support integrated natural resources management programs; and
- h. procurement, maintenance, and repair costs for equipment and materials to support integrated natural resources management programs and projects.

Agricultural outleasing income funds to support natural resources management operations are managed by Marine Corps Installations Command (MCICOM; Natural Resources Section). Direct obligation authority provided for the agricultural outleasing fund may not be transferred to other accounts or used for purposes not identified by integrated natural resources management. Modification of the plan may be made based only on prior approval by the MCICOM. Natural resources program requirements that may be funded with agricultural outlease income do not include (MCO 5090.2, para. 11201.8):

- a. mitigation or compensation for damages to natural resources caused by construction projects or military activities;
- b. costs of the production of forest products (*e.g.*, lumber);
- c. costs of recurring grounds maintenance on improved and semi-improved grounds (*e.g.*, mowing, fertilizing, irrigating, seeding, pruning, ornamental planting, and pest control);
- d. archaeological/cultural resources survey costs and other cultural resources management costs unrelated to natural resources management;
- e. costs of animal damage control unrelated to natural resources management (costs of controlling or reducing bird/animal aircraft strike hazards are not excluded); and
- f. general environmental and facilities organizational support costs that are unrelated to natural resources management.

Appendix E, Table E.1 lists projects for which agricultural outlease income funding is programmed for INRMP implementation.

Other Funding

Certain projects within this INRMP are not directly funded through the Natural Resources Division. These include natural resource-based mitigations that are associated with facility projects, and projects that have secondary or indirect benefits for natural resource conservation. Costs for these projects are not included within this INRMP.

In the future, MCAS Miramar may seek special funding under DoD special programs:

- The DoD Legacy Program provides funding for regional ecosystem management initiatives, habitat preservation efforts, invasive species control, and/or monitoring and predicting migratory patterns of birds and animals (www.dodlegacy.org).
- The DoD Strategic Environmental Research and Development Program (SERDP) provides funding to pursue high-risk/high-payoff solutions to DoD's most intractable environmental problems. SERDP promotes the development and application of innovative environmental technologies to support the long-term sustainability of military installations as well as significantly reducing current and future environmental liabilities (www.serdp.org).
- The DoD Encroachment Partnering/Buffering (REPI) Program provides funding for acquisition or long-term conservation easements on adjoining third-party lands, to ensure that encroachment does not threaten the ability of an installation to perform its military mission (see Section 6.2.4, *Encroachment Partnering*).

Each of these programs has specific goals, objectives, requirements, and priorities, which require the submission of proposals that must compete for relatively limited funding.

9.2 INRMP Implementation Costs

Appendix E, Table E.2 contains a summary of funding avenues and dollars required by COLS Levels (project priorities) for implementation of this INRMP. Table E.2 also includes the grand total implementation cost for all projects and actions during this INRMP period, subject to inflation.

9.3 INRMP Evaluation

DoD, USFWS, and the Association of Fish and Wildlife Agencies for a Cooperative Integrated Natural Resource Management Program on Military Installations have a Memorandum of Understanding (MOU) (dated July 2013) regarding the process for review and concurrence on updates to existing INRMPs. It is DoD policy to review INRMPs annually, and a statutory requirement to have INRMPs reviewed by the USFWS and appropriate state fish and wildlife agency or agencies (hereafter "states") for operation and effect at least every five years.

In addition, DoD published *Guidelines for Streamlined INRMP Review* (July 20, 2015), and the USFWS published its own internal guidelines for coordination on INRMP reviews (June 15, 2015). To more effectively and rapidly adapt to ongoing natural resource activities, and to respond to revisions that are administrative or process-oriented, the three partners (DoD, USFWS, and states as represented by the Association of Fish and Wildlife Agencies) included a provision in the MOU that streamlines the review process for incorporating minor changes or "updates" to existing and approved INRMPs. INRMP updates are minor changes to an INRMP that do not result in new biophysical effects, do not change the management prescriptions set forth in the INRMP, and do not require public review or analysis under NEPA. The use of updates is intended to reduce the workload for all agencies involved, while maintaining both INRMP currency and mission flexibility. The specific document format, step-by-step coordination process, and administrative responsibilities under the streamlined process are described in the *Guidelines for Streamlined INRMP Review*.