

## **APPENDIX A**

### **RESOURCE AGENCY(IES) ENDORSEMENT**

Pursuant to the Sikes Act Improvement Act (Public Law 105-85, Div. B Title XXIX, November 18, 1997, 111 Stat. 2017-2019, 2020-2033), this Integrated Natural Resources Management Plan must reflect the mutual agreement of the Department of Defense the Department of Interior, acting through the Fish and Wildlife Service, and the state fish and wildlife agency concerning “conservation, protection, and management of fish and wildlife resources.” Following are letters received by the United States Fish and Wildlife Service and the California Department of Fish and Game.

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## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

California/Nevada Operations Office  
2800 Cottage Way, Suite W-2606  
Sacramento, California 95825-1846

In Reply Refer To:  
FWS-MCBCP-2317.1

OCT 19 2001

Commanding General  
Marine Corps Base Camp Pendleton  
P.O. Box 555008  
Camp Pendleton, California 92055-5008

Attn: Mr. Lupe Armas

Re: Integrated Natural Resources Management Plan (INRMP) for Marine Corps Base Camp Pendleton, San Diego County, California

Dear Commanding General:

We have reviewed the October 2001 Integrated Natural Resources Management Plan (INRMP) for Marine Corps Base Camp Pendleton (Base) in San Diego County, California. This INRMP has been submitted pursuant to the Sikes Act Improvement Act (SAIA) of 1997, which requires that INRMPs reflect the mutual agreement of the Department of Defense and the Department of Interior, acting through the Fish and Wildlife Service, concerning conservation, protection, and management of fish and wildlife resources. The purpose of the INRMP is to provide for the conservation and rehabilitation of natural resources on military installations, while continuing to support the military mission. Requirements of the SAIA relating to conservation and rehabilitation of natural resources mandate that the INRMP shall provide for:

- fish and wildlife management, land management, forest management, and fish- and wildlife-oriented recreation;
- fish and wildlife 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 and;
- establishment of specific natural resource management goals and objectives and time frames for proposed action.

As stated in the Memorandum of Understanding (MOU) dated March 25, 1999, between the Department of Defense and the Fish and Wildlife Service, INRMPs are to be based on ecosystem management principles and guidelines. As stated in this MOU, the Fish and Wildlife Service will assist in the development of INRMPs, specifically by providing expertise on:

- protecting, managing, restoring, and conserving fish, wildlife, and plant resources and their habitats, to include inventorying and trends analysis for aquatic and terrestrial habitats;
- protecting candidate, threatened, and endangered species as specified in the Endangered Species Act (ESA), and in consultation with the Fish and Wildlife Service, including coordinated protection and mitigation measures, methods and procedures for enhancing these species; and
- protecting species specified in the Migratory Bird Treaty Act.

We anticipated early involvement in the development of the INRMP due to the complexity of natural resource management issues on the Base. Our Carlsbad Fish and Wildlife Office, however, was not consulted on the development of the plan prior to receiving the Base's Draft Final INRMP on May 3, 2001. Upon review, we expressed concern to the Base that this Draft Final INRMP did not adequately address environmental contaminants, migratory bird conservation, and ESA section 7 compliance. The Draft Final INRMP proposed few natural resource management actions beyond those dictated by regulatory compliance and did not reflect a comprehensive proactive plan for managing natural resources on Base. We also commented that the Draft Final INRMP placed a disproportionate emphasis on the Base's military mission and related encroachment issues while inadequately addressing natural resource stewardship, a comprehensive set of actions to address conservation of all habitats on Base using an "ecosystem management" approach, and adequate organization and clarity.

Subsequent to receiving the Draft Final INRMP, representatives from the Fish and Wildlife Service and the Base met on seven different occasions (including four meetings that included representatives from the California Department of Fish and Game) to discuss the INRMP, with the wildlife agencies expressing concerns about the form and content of the document and providing proposed revisions. Through these meetings, the wildlife agencies and the Base were able to agree on revisions to the INRMP that:

- provided a better accounting of wildlife agency involvement in the INRMP development;
- improved the document organization;
- limited mission encroachment statements to a reasonable level;

- identified which planned management actions were based on compliance with existing biological opinions;
- cross-referenced planned actions repeated in multiple sections;
- prioritized planned actions that currently lack funding; and
- added and/or improved sections related to environmental contaminants, migratory bird conservation, and ESA section 7 compliance.

With these revisions, this plan meets the minimum requirements of the SAIA. Therefore, the Fish and Wildlife Service concurs, with conditional remarks, that this document will provide a framework for managing natural resources on the Base while continuing to support ongoing military training requirements. Despite revisions noted above, we maintain that the INRMP should be improved to more strongly reflect the Base's natural resource stewardship responsibilities. The following are our conditional remarks regarding the current limitations of the INRMP:

#### 1. Document Clarity

The chapter describing natural resources management (Chapter 4) is unwieldy, with excessive repetition of planned actions and weak or insufficient relationships between goals, objectives, and planned actions. Thus, the INRMP does not clearly and succinctly outline the Base's strategy for natural resources management and requires improvements in this area in order to be of use to Base management personnel.

#### 2. Resource Stewardship

In general, the INRMP does not fully address the importance of natural resource conservation and stewardship. While the INRMP emphasizes the importance of the military mission and perceived encroachment on this mission, it does not explain the Base's natural resource stewardship responsibilities. We understand the preeminence of the military mission on Base, however, management of habitats solely for the purpose of military training does not adequately address the intent of the SAIA "to provide for the conservation and rehabilitation of natural resources on military installations." Therefore, we are concerned that such an approach may not conserve the full range of biodiversity currently existing on Base. The document continues to reflect a reactive, compliance-driven set of actions, rather than a proactive and comprehensive plan for managing natural resources on Base.

### 3. Ecosystem Management

The INRMP states that the Base is managing and will continue to manage the natural resources on their lands using an “ecosystem management” approach. While the INRMP addresses management of wetland habitats, it does not adequately address other habitats in the same manner. Most actions directed at management of wetlands are in compliance with the terms and conditions of previous biological opinions and do not represent new actions. We maintain that the INRMP should constitute a proactive management plan that includes conservation goals for all habitats, provide management consideration for species beyond those federally or State-listed as threatened or endangered, and address how management actions will conserve biodiversity on Base.

The majority of management actions that may affect listed species have been previously consulted on in the Riparian and Estuarine/Beach Biological Opinion (1-6-95-F-02) or will be addressed in the ongoing Programmatic Uplands Endangered Species Management Plan consultation. Therefore, additional formal consultation under section 7 of the Endangered Species Act of 1973, as amended, is not required. The SAIA directs installations to review INRMPs and update them at least every five years. We anticipate that future revisions of the INRMP will address our stated areas of concern. We look forward to continued cooperation on the further developments of the INRMP for Marine Corps Base Camp Pendleton. If you have further questions regarding this letter, please contact the Field Supervisor of the Carlsbad Fish and Wildlife Office at (760) 431-9440.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Stoyson". The signature is fluid and cursive, with the first name "Steve" and last name "Stoyson" clearly distinguishable.

Acting Manager

cc: California Department of Fish and Game (attn: C. Raysbrook)  
Field Supervisor, Carlsbad FWS

**DEPARTMENT OF FISH AND GAME**

South Coast Region  
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06-11-01 12:46 RCVD



October 22, 2001



Major General David F. Bice, Commanding General  
U. S. Marine Corps Base Camp Pendleton  
Box 555010  
Camp Pendleton, California 92055-5010

Attention: Mr. Ken Quigley

Dear Major General Bice:

**Integrated Natural Resource Management Plan (INRMP) for Camp Pendleton**

The California Department of Fish and Game (Department) has participated in the review and preparation of the INRMP, serving as the State wildlife agency, pursuant to the Sikes Act Improvement Act (SAIA). Our involvement has included meetings with INRMP consultants, discussions with the U. S. Fish and Wildlife Service, and submittal of written and oral comments to the INRMP preparers. Due to the condensed time line under which the INRMP was presented to our office for review, and our pre-existing staffing commitments, our review and comments were necessarily limited to those issues that most directly affect fish and wildlife resources. The majority of our identified issues have been addressed in the October 2001 version, and the Department concurs that the INRMP satisfies the requirements of the SAIA.

The INRMP process requires each responsible military installation to provide for regular updating of its plan. Our office will continue, to the extent of our staffing capabilities, to meet with Camp Pendleton staff and contractors to refine the INRMP. We believe that this initial plan provides the necessary framework and effectively describes the policies, programs, actions and priorities for managing the natural resource on the Base with respect to existing and future necessary military operations.

Please continue to keep this office informed about the INRMP. Our contact is Mr. Bill Tippetts, Environmental Program Manager, who can be reached at the above address or at (858) 467-4212.

Sincerely,

C. F. Raysbrook  
Regional Manager

cc: See next page.

Major General David F. Bice, Commanding General  
U. S. Marine Corps Base Camp Pendleton  
October 22, 2001  
Page 2

cc: Department of Fish and Game

Robert C. Hight  
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Ron Rempel  
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BT:bt/sl

File:Chron

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