



United States Department of the Interior

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To: All California Offices
From: State Director
Subject: Clarification of 6840 With Respect to Special Status Plant Species

The new BLM Manual 6840 signed by the BLM Director on December 12, 2008, authorizes BLM State Directors to designate BLM sensitive species within their respective jurisdictions, a continuation of policy that was in effect at the time California Manual Supplement 6840.6 and California BLM Handbook H-6840-1 were approved by the State Director in 1996. The California policy as set forth in these documents is:

“Unless specifically excluded by the State Director all plants on List 1B (Plants, Rare, Threatened, or Endangered in California and Elsewhere) of the most recent edition of the California Native Plant Society’s *Inventory of Rare and Endangered Plants of California* that are on BLM lands or affected by BLM actions and that do not fall into one of the other categories of this section are designated as sensitive species in California.”

The “other categories” referred to in this policy consisted of plants that were Federally listed, proposed, or candidates and plants that were State-listed as rare, threatened, or endangered, because the version of BLM Manual 6840 that was in effect at that time automatically treated species in these categories as special status species, and it was therefore, unnecessary to designate them as sensitive.

The new 6840 Manual restricts the designation of special status to species that are Federally listed, Federally proposed, or BLM sensitive. This includes direction for species that are Federal candidates that are to be managed as BLM sensitive species. Unlike previous versions, the new 6840 Manual makes no provision for State-listed species.

We are working on the California Manual Supplement 6840.6 and California BLM Handbook H-6840-1 revision to reflect the changes discussed above. In the interim, the following policy will apply to the designation of BLM sensitive plant species in California.

- Unless specifically excluded by the State Director, all plant species listed by the State of California as rare, threatened, or endangered will be treated as BLM sensitive species.
- Unless specifically excluded by the State Director, all plant species on List 1B (Plants, Rare, Threatened, or Endangered in California and Elsewhere) of the California Native Plant Society's Online *Inventory of Rare and Endangered Plants of California* that are on BLM lands or affected by BLM actions and that are not Federally listed or proposed are designated as sensitive in California. ¹

Both State-listed plant species and CNPS List 1B plant species meet the new 6840 Manual's requirements for sensitive species designation (found at 6840.2A). The listing process used by the State of California to designate species as threatened or endangered is comparable to the process employed by the U.S. Fish and Wildlife Service, so only those plants experiencing downward trends and/or under significant threat are listed. The plant species on List 1B in the CNPS Inventory are rare throughout their range and are vulnerable under present circumstances or have a high potential of becoming so because of their limited or vulnerable habitat, their low numbers of individuals per population, or their limited number of populations. Most of the plants of List 1B have declined significantly over the last century. BLM plays a critical role in the conservation of these species.

All of the plants in the CNPS Online Inventory are reviewed periodically by expert botanists in academia, public agencies, and the private sector to ensure that species are placed on the appropriate list (in addition to List 1B, the CNPS Inventory recognizes other lists, including List 2, Plants Rare, Threatened, or Endangered in California but More Common Elsewhere, and List 3, Plants About Which We Need More Information). Thus, there is strong scientific backing behind the species on List 1B. The taxa on CNPS List 2, List 3, and List 4 are not included on the BLM sensitive list.

All other provisions of California Manual Supplement 6840.6 and California BLM Handbook H-6840-1 will continue to apply, including the process involved in adding other plant species to the sensitive plant list or removing species from the list and the inventory and monitoring requirements for special status plant species.

Please be advised that the CA BLM sensitive species list for both plants and animals must be updated per WO-IM2009-039 by the end of this fiscal year. We will provide more guidance prior to beginning that process.

For further information regarding this IM, please contact Christina Lund, State Botanist, at the California State Office, (916) 978-4638.

Signed by:
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Acting State Director

Authenticated by:
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Records Management

¹ The California Native Plant Society's Online Inventory can be found at: <http://cnps.web.aplus.net/cgi-bin/inv/inventory.cgi>