



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
California State Office
2800 Cottage Way, Suite W-1623
Sacramento CA 95825
www.ca.blm.gov

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Information Bulletin No. **CA-2010-012**

To: All CA District and Field Managers

From: Acting State Director, CA

Subject: Survey Protocols Required for NEPA and ESA Compliance for BLM Special Status Plant Species

Purpose: The purpose of this Information Bulletin (IB) is to provide guidance on the requirements for conducting special status plant species surveys/inventories for ground disturbing projects.

Background: In July 2009, IM No. CA-2009-026 was issued. This IM provided protocols for Survey Requirements for Special Status Plants with regards to NEPA and ESA compliance. In 1996 the BLM California State Director signed the Special Status Plant Management Handbook 6840-1. This Handbook details survey and inventory protocols required by BLM CA. IM CA-2009-026 and attached protocols supersede that section of the 6840-1 Handbook.

Policy: It is BLM policy to conduct surveys/inventories to determine the occurrence and status of all special status plant species on lands managed by BLM or affected by BLM actions. This includes pro-active inventories directed toward developing plans or determining the status of plant species, as well as inventories conducted to determine the impacts of BLM planned or authorized actions on any special status plants that might be within the area of a proposed project. Such surveys/inventories are to be conducted at the time of year when such plant species can be found and positively identified. Before conducting inventories, contractors for BLM or energy companies should research four valuable sources to see if BLM special status species are known from the project area: the California Natural Diversity Data Base (CNDDDB), CALFLORA, Nevada Natural Heritage Program (NNHP) and the Biogeographic Information & Observation System (BIOS). However, CNDDDB, NNHP and BIOS are positive occurrence databases only; the lack of data should not be used as verification that the species does not exist in a given location. Inventories must be timed so that contractors can both locate and positively identify target plant species in the field. Inventories must be scheduled so that they will detect all special status species present. A single inventory on a single date will seldom suffice. For example, when one special status plant species suspected to be in the inventory can only be found and identified in April and another species can only be located and identified in August, at least two inventories are necessary. The first inventory can facilitate the second and/or third

inventory; however, only if potential sites for the late-flowering species are flagged during the first inventory. If sufficient information is available on the habitat requirements of potentially occurring species (substrate, plant community, etc.), and the site in question is believed to be unsuitable for those species, a properly timed field visit should still be conducted to document and validate the assumptions for believing the species to be absent. In advance of the project site inventory, contractors should visit known populations of the target species in similar habitat conditions to determine current-year growth conditions and phenology. If, based on these visits to known populations, it appears likely that the project site inventory will fail to detect occurrences because of drought conditions (as may be the case for annual plant species or geophytic plants), BLM may require contractors to perform additional inventories in the following year.

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

Signed by:
James Wesley Abbott
Acting State Director

Authenticated by:
Richard A. Erickson
Records Management