

**PEP – ENVIRONMENTAL STATEMENT MEMORANDUM NO. ESM03-6**

To: Heads of Bureaus and Offices

From: Willie R. Taylor, Director  
Office of Environmental Policy and Compliance

Subject: Procedures for Implementing Adaptive Management Practices

The requirements in this Environmental Statement Memorandum (ESM) are being issued under the authority provided to the Office of Environmental Policy and Compliance (OEPC) by 381 Departmental Manual (DM) 4.5B, to convey instructions and guidance through its Environmental Memoranda Series, and by 516 DM 6.2, which authorizes OEPC to provide advice and assistance to the Department on matters pertaining to environmental quality and for overseeing and coordinating the Department's compliance with NEPA, the CEQ regulations, and 516 DM 4.22, which authorizes OEPC to provide further guidance concerning NEPA.

1. Purpose and Scope

The purpose of this memorandum is to provide guidance to bureaus and offices on implementing adaptive management practices in NEPA compliance.

2. Adaptive Management

For the purposes of this memorandum, 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. Adaptive management recognizes that knowledge about natural resource systems is sometimes uncertain and is the preferred method of management in these cases.

3. Procedures

a. As part of the NEPA evaluation process, bureaus should make a determination of environmental effects of a project and identify the mitigation needs along with other permitting and regulatory requirements. The NEPA analysis should also indicate where data are lacking and uncertainty exists with respect to the intended outcomes and the significance of this lack (see 40 CFR 1502.22).

- b. Monitoring designed for adaptive management must be able to result in appropriate adjustments in project activities as the project is constructed and planned mitigation is installed. This monitoring needs to be built into the project and considered in the NEPA analysis and documentation.
- c. In carrying out initial public participation in the NEPA evaluation process, bureaus should strive to ensure public input into and understanding of the principles of adaptive management.
- d. Bureaus should maintain open channels of information to the public and affected regulatory and permitting agencies during the application of adaptive management, including transparency of the monitoring process that precedes adaptive management and the decision-making process that implements it. This involves: (a) identifying indicators of change, (b) assessing monitoring activities for accuracy and usefulness, and (c) making changes in tactics, activities and/or strategies.
- e. Bureaus should provide post-activity opportunity for public and affected outside agency review of adaptive management practices, including practices that were exceptions to any resource management plans or that had permitting and other regulatory requirements not satisfied by prior coordination.