

Coalition for Nevada's Wildlife

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Fellow Nevadans

The attached document is a proposed long-term Congressional solution to protect and enhance populations of Greater Sage Grouse (sage-grouse) and their habitat thereby preventing listing by the USFWS under the Endangered Species Act (ESA). It was formulated by a broad base of individuals representing a wide spectrum of public land multiple use stakeholders that were looking for the best win-win for everyone involved. It was also formulated using the premise that all of the stakeholders will have to give something in order to get something.

The USFWS has made clear what will be required to prevent an ESA listing:

- 1) Stop the current decline – a 'Game Changer'
- 2) Needs to be measureable and repeatable
- 3) Needs to be long-term sustainable

Many of the ideas in this proposal are based on existing, successful wildlife programs. These programs began with no money and no political help. With so many of the key players seemingly ignoring the issue, or arguing over the need and legality for ESA listing, we decided to address the USFWS requirements directly with this proposal, which is summarized below:

- 1) Federal land agency reforms, which include a 'Sage-Grouse Strike Team'. A dedicated group within the agencies to act quickly and effectively on land management in sage-grouse 'Critical Habitat'. (Requiring the respective agencies to do something 'by Law' does not always get results on the ground. Any Federal action needs to DICTATE funds, staffing and responsibilities so there is no local "interpretation" or agency dilution.)
- 2) A new 'Congressional Land Designation'. This ensures everyone knows the rules and how best to manage for sage-grouse in the identified 'Critical Habitat' areas.
- 3) A funding structure that is currently used across State and Federal agencies that still ensures local prioritization and implementation of projects on the ground.

We feel that the ideas set forth in our proposal are truly the 'Game Changer' required. We strongly urge they be considered, in whole or part, by any final solution to this issue.

Respectfully Submitted,

The Coalition for Nevada's Wildlife

Larry J. Johnson, President

**NEVADA SPORTSMEN AND CONSERVATIONISTS WORKING FOR
THE ENHANCEMENT OF WILDLIFE AND HABITAT**

The Coalition for Nevada's Wildlife

PROPOSAL FOR SAGE GROUSE CONSERVATION AND A NEW CONGRESSIONAL LAND DESIGNATION

Revision 12 for Distribution

STATEMENT OF PURPOSE:

The primary purpose of this proposal is to conserve and restore the Greater Sage Grouse (*sage-grouse*) and its habitat resulting in sustainable populations for present and future generations. Implementation of this proposal will help preclude the need for an Endangered Species Act (*ESA*) listing by the U.S. Fish and Wildlife Service (*USFWS*). While this document is focused primarily on the Greater Sage Grouse, it is also applicable to the Bi-State sub-species of sage-grouse as well.

The Coalition for Nevada's Wildlife (*COAL*) is a consortium of northern Nevada sportsmen and conservation organizations which have worked together for the past 23 years addressing wildlife management and legislative issues. Nevada sportsmen have underwritten research, management and habitat improvement since the 1950's. We recognize that in order to maintain and increase sage-grouse populations, and to prevent *ESA* listing, we must work with a broad spectrum of state, federal, and citizen organizations.

In 2004 the Nevada Department of Wildlife (*NDOW*) sponsored working groups to develop a sage-grouse plan. Those efforts, however, have not been sufficient to overcome the impacts of wildfires, invasive weeds, pinion-juniper encroachment, drought, predation, over grazing and ongoing development. Across the West, sportsmen have invested millions of dollars to conserve and enhance wildlife and habitat, particularly sage-grouse. Sportsmen support state management of all wildlife species. In fact sportsmen take pride in their collective efforts to maintain and enhance state wildlife by underwriting most of the costs of *NDOW* and through the extensive private funding we have contributed. We recognize our support, as leaders for wildlife management, is essential in maintaining state management of the sage-grouse. An *ESA* listing would signal failure of the *COAL*'s mission to "Protect and Enhance our Wildlife Resources."

Further, the *COAL* believes that *ESA* listing of sage-grouse would be detrimental to Nevada's economy, including its ranching heritage, mining, recreation, agriculture, and other consumptive and non-consumptive uses of our public lands. To avoid this detrimental impact, and insure future sustainable sage-grouse populations, considerable habitat restoration and enhancement must be accomplished over a long period of time.

The COAL recognizes that the State of Nevada Sage Brush Ecosystem Council (*SEC*) and the Sagebrush Ecosystem Technical Team (*SETT*) are developing policies, will be identifying Critical sage grouse areas, and a funding mechanism which will benefit sage grouse. We are hopeful that the recommendations set forth in this proposal complement their efforts and believe they should play a major role in the implementation and regulation of this proposed land designation and its funding.

The COAL believes that in accordance with the USGS Nevada Mapping Model (*developed by Dr. Peter Coates*) there are approximately 12 million acres recognized as the "Best of the Best" (BOB) "Core Habitat", 9.8 million acres of high suitability "Priority Habitat", and 10.9 million acres of low to moderate suitability "General Habitat" for the Greater Sage Grouse. The primary focus of this proposal are the areas identified as "Critical" which are the "Core" areas, as well as portions of "Priority" and/or "General" areas deemed necessary for management through sound science. These areas should be the most restrictive in terms of other uses and receive priority for financial investment.

This proposal will help protect sage-grouse and its habitat using the three separate but interconnected components outlined in this proposal:

- I. Provide a more streamlined, effective and efficient means for federal land managing agencies to implement and monitor sage-grouse habitat restoration and management which will allow them to be more proactive and less reactive. This component suggests a dynamic new concept utilizing an interagency and interdisciplinary "Sage-Grouse Strike Team" dedicated for Nevada which we feel is critical to its success.
- II. Provide long-term regulatory certainty with a new Congressional land designation (for the purposes of this proposal "Sage Grouse Conservation Areas" or "SGCA".) which has the sage-grouse and its critical habitat as a priority and primary focus and is not detrimental to other wildlife species.
- III. Provide a funding stream for both I and II which will allow long-term and steady funding for land agency streamlining and sage-grouse habitat restoration and management.

We feel all three of these components are crucial to the overall effectiveness of a long term sage-grouse solution.

In closing the COAL believes that sage-grouse can be maintained as a state managed species partly by establishing a new Congressional land designation, and by providing extensive federal and state funding for a long period of time as described herein. The ideas set forth in this proposal should be implemented whether or not an ESA listing of the sage-grouse occurs.

I. STREAMLINE FEDERAL LAND MANAGEMENT AGENCY DECISIONS AND ACTIONS

A. Causes For Needed Reform:

- 1) Lack of sufficient funding in the areas of need
- 2) Lack of field personnel
 - a) Too many regulations and not enough personnel to properly implement, enforce, and monitor them
- 3) Lack of consistent monitoring and enforcement
- 4) Lack of "Adaptive Management" practices (as defined in the Nevada Rangeland Monitoring Handbook , Second Edition - Educational Bulletin 06-03 attached as Appendix B)
- 5) Decisions and actions are often too slow
- 6) Agencies are mostly reactive, not proactive

B. Public Land Habitat Management Decisions And Actions Must Be Made Faster And Decisively To Be More Effective On The Ground:

- 1) Develop an interagency and interdisciplinary "Sage-Grouse Strike Team" dedicated for Nevada, to expedite project approvals, delivery, monitoring, and follow up
 - a) *This team would be comprised of experts in all the required aspects of sage-grouse habitat management which include, but not limited to:*
 - NEPA Preparation
 - Riparian area management
 - Grazing permit and contract compliance
 - Archeological studies and clearances
 - Wildfire prevention and restoration
 - Invasive plant and tree control
 - Wild horse management
 - b) *This team would, among other things:*
 - Prepare all of the NEPA documents necessary for implementing actions from the sage-grouse EIS
 - Use a Programmatic NEPA planning approach
 - Timely and consistently monitor compliance and enforcement for all permitted activities in sage-grouse habitat in Nevada
 - Would include but not be limited to: grazing permit monitoring, leasing monitoring, wild horse monitoring, etc
 - Based on best science evaluate and monitor the effectiveness and success of all sage-grouse habitat projects
 - Make recommendations for adaptive management (critical to ensure that restoration funds are being effectively spent and the projects are accomplishing the sage-grouse habitat restoration objectives)
 - c) *Team members would be cross-trained in other members areas of expertise*
 - d) *Team would utilize third party consultants if necessary to expedite processes*

- 2) Agencies Must Become More Proactive And Less Reactive!
 - a) *Listen to the land users*
 - b) *Allow range managers more flexibility for to deal with issues on the ground*
 - c) *Deal with issues quickly and decisively using all the means listed above*
 - d) *Implement more field projects*

II. NEW CONGRESSIONAL "SGCA" LAND DESIGNATION

A. Need For This Designation:

- 1) The COAL has reviewed existing federal land designations, both administrative and congressional, as to their appropriateness for protecting Critical sage grouse areas. Congressional designations such as "National Wildlife Refuges" (such as Sheldon National Wildlife Refuge), "National Conservation Areas" (such as Black Rock, High Rock, Emigrant Trail) or existing "Wilderness Areas" and proposed "Wilderness Study Areas" (WSA) provide some habitat protection but not sufficient to "stop the decline" of Critical habitat and thus sage-grouse. Administrative designations like "Areas of Critical Environmental Concern" (ACEC) could contain some of the necessary requirements, but lack the "Regulatory Certainty" that will be required.
- 2) At this point we have identified no existing federal designations which totally encompass the breadth of habitat or the scope of protective regulatory measures needed for the sage-grouse and its Critical habitat (See "Specific Issues with the Current Public Land Designations" attached as Appendix A.)

B. "SGCA" is Not Intended To Be A Substitute For Wilderness:

- 1) The COAL supports a review of the existing Wilderness Study Areas (WSAs) overlapped with the Nevada Mapping Model to identify critical sage-grouse habitat which will require management
 - a) *We have concerns that the WSA's may not encompass the total sage-grouse and habitat needs*
 - b) *WSA's may not be in identified Critical sage-grouse habitat areas*
 - c) *WSA's and Wilderness Areas may limit crucial habitat manipulation and management*
- 2) Based on the Nevada Mapping Model and WSA overlap review, "Carve Outs" of critical sage-grouse habitat from the WSAs and substituting with the "SGCA" designation, shall be preferred
- 3) "Carve Outs" for other critical wildlife habitat shall also be considered
 - a) *2) and 3) are similar to the Pine Forest Range Wilderness Process*
 - b) *2) and 3) will assure that any existing identified Critical sage-grouse habitat, as well as other critical wildlife habitat, in good to excellent condition, but with a high probability of burning in the future, will receive required proactive motorized/mechanized pre wildfire prevention, aggressive wildfire response and rapid post wildfire reclamation work*
- 4) Federal land agency managers shall be required to follow the provision set forth by the Wilderness Act to grant timely waivers for protection and restoration of

critical sage-grouse and other wildlife habitat, specifically temporary use of motorized mechanized equipment for:

- a) *Fire suppression including pre and post-fire management*
 - b) *Noxious and invasive species management*
 - c) *Habitat restoration*
 - d) *Maintenance of existing water and spring developments*
 - e) *New water and spring developments*
 - f) *Fencing of wet meadows and riparian areas*
 - g) *Pinion-juniper removal and controlled burns*
 - h) *Wildlife management and protection*
- 5) Upon the above review the COAL will support certain individual WSA's for designation as Wilderness if manipulation or restoration is not required

C. Goals For The "SGCA" Land Designation:

- 1) Stops the decline of the sage-grouse and its identified "Critical" habitat
- 2) Restores sage-grouse populations
- 3) Provides the USFWS with the regulatory certainty needed to ensure that identified critical habitat areas will be managed for long-term protection and restoration
- 4) Is compatible with multiple uses
- 5) Is based on:
 - a) *Best available sound science management of sage-grouse and its habitat as the primary focus*
 - b) *The Nevada Mapping Model identifying Critical habitat*
 - c) *Identifying funding strategies at the federal and state levels to provide a steady long term investment in habitat improvements*
 - d) *Ensuring that identified Critical habitat receives the highest priority for investment*
 - e) *Streamlining federal land decisions and actions allowing proactive, efficient and expedient management approvals that benefit the sage-grouse and its habitat*

D. Specific Objectives For The "SGCA" Land Designation:

- 1) Prioritize Critical sage-grouse habitat using the USGS Nevada Mapping Model
 - a) *"Core Habitat" (approximately 12 million acres)*
 - *"Best of the Best" (BOB) Predicted high use areas*
 - b) *"Priority Habitat" (approximately 9.8 million acres)*
 - *"High Suitability" areas outside the core areas*
 - c) *"General Habitat" (approximately 10.9 million acres)*
 - *"Low to Moderate Suitability" areas outside the core areas*
 - d) *This designation concerns sage-grouse habitat referenced as "Critical" which is "Core", and any identified "Priority" and/or "General" deemed necessary for proper management through sound science*
- 2) Existing Habitat Protection and Improvement
 - a) *"Stop the bleeding"- Take care of what is already in good condition and don't allow further losses or habitat fragmentation*
 - *Use of "Adaptive Management" practices (See Appendix B)*
 - *All available treatment methods, mechanical and non-mechanical, should be used for non-native invasive species*
 - *Pinion-juniper removal*

- *Hazardous fuels reduction and green stripping*
- *Protection and enhancement of brood rearing habitat utilizing wildlife friendly fences*
- *Seasonal access restrictions*
- *Water and spring rehabilitation and developments*
- *Proper grazing management*
 - *Wild horses and burros*
 - *Livestock*

3) Wildfire Suppression

a) Reinforce a governmental agency defense priority for critical sage-grouse habitat

- *Second only to human life, inhabited or historical structures*

b) Timely use of motorized mechanized equipment

c) Timely priority use of aircraft

- *Recommend a designated air tanker fleet for Nevada*

4) Wildfire Rehabilitation

a) Rapid Response (strive to achieve 80% success by getting on the ground within 2 months after a fire)

- *Expedite archeological clearances*
 - *Create a dedicated archeologist position shared between NDOW and federal land agencies or through the proposed Sage-Grouse Strike Team*
- *Priority seed and plant availability for Nevada*
 - *Need reliable access to existing climate controlled long term seed storage facilities.*
 - *Need to construct additional climate controlled long term seed storage facilities if needed.*
 - *Offer SEC Conservation Credits for growing and storing seeds and plants (to mining, ranching and agricultural interest)*
- *Money needs to be available for immediate allocation*
- *Use of motorized mechanized equipment*
- *Use of aircraft*
- *Herbicide treatments where appropriate*
- *Green Stripping where appropriate*
- *Use of both native and non-native plant species where appropriate*

b) Follow-up required on all rehabilitation projects

- *Monitoring and reporting*
- *Use of "Adaptive Management" practices (See Appendix B)*

c) Continuing research and development of better seed stock and delivery methods is a must

5) Maintain Multiple Land Uses

a) Grazing and Agriculture

- *Timely enforcement of all grazing permits conditions*
- *Willing seller or retired allotments would become grass-banks for ranchers or farmers in need*
- *Offer incentives for those who keep their allotments in healthy condition:*
 - *Federal and state agencies allow users more flexibility in managing their allotments*
 - *State Conservation Credits through the Sagebrush Ecosystem Council*

- *Receive priority for temporary nonrenewable permits to use grass- banks*
 - *Willing seller and retired allotments that are in need of rehabilitation will be allowed to rest and then included in grass- banks*
 - *Incentives for voluntary temporary deferment of grazing on critical (Core and necessary Priority) sage-grouse habitat using the CRP model*
 - *Incentives for Ranching and Agriculture to provide seed banks and long term storage*
- b) Wild Horse and Burro Management**
- *Prevent overgrazing*
 - *HMA's shall be managed at the low end of AML levels.*
 - *The identified Critical sage-grouse habitat areas should be the priority for gathers and birth control measures*
- c) Mining Exploration and Development (The SEC proposed mitigation guidelines are not currently available. These are the COAL's minimum recommendations)**
- *Withdrawal of identified Critical sage-grouse habitat except for valid existing claims*
 - *With priority level mitigation on valid existing and future claims*
 - *Core Level Habitat at a 4:1 ratio*
 - *Priority Level Habitat at a 2:1 ratio*
 - *General Level Habitat at a 1:1 ratio*
 - *Based on a \$1000.00 per total acres impacted*
 - *Disturbance of Priority or General Habitat will require mitigation as recommended above for all disturbed and affected areas*
- d) Energy Exploration and Development**
- *Withdrawal of identified Critical sage-grouse habitat for all new leases*
 - *Voluntary withdrawal of identified Critical sage-grouse habitat for existing leases*
 - *Withdrawal of existing leases would require leaser compensation*
 - *With priority level mitigation (as with Mining) for existing leases*
 - *Any developments would also be subject to applicable development fees, royalties and bonds*
- e) Oil and Gas Exploration and Development**
- *Withdrawal of identified Critical sage-grouse habitat for all new leases*
 - *Voluntary withdrawal of identified Critical sage-grouse habitat for existing leases*
 - *Withdrawal of existing leases would require leaser compensation*
 - *With priority level mitigation (as with Mining and Energy) for existing leases*
 - *Any developments would also be subject to applicable development fees, royalties and bonds*
- f) Access Roads and Trails**
- *There shall be no new construction of improved roads, primitive roads or motorized and mechanized vehicle trails within identified Critical sage-grouse habitat areas, pursuant to emergencies and valid existing rights.*
 - *There shall be no motorized and mechanized vehicle cross country travel, including Special Permitted events, in any identified Critical sage-grouse habitat areas*
 - *The managing land agencies shall begin an immediate route designation assessment process to establish or amend a minimal, sustainable route system with identified Critical sage-grouse habitat area needs as the priority*
 - *Existing improved roads, primitive roads, motorized and mechanized vehicle and hiking/riding trails that serve as important public access points within*

identified Critical sage-grouse habitat areas should be maintained if possible, or relocated, to insure continued public access

- *Eliminate and rehabilitate redundant routes to maintain or re-establish Critical sage-grouse habitat*
- *The responsible agencies shall manage designated primitive roads, motorized and mechanized vehicle and hiking/riding trails within identified Critical sage-grouse habitat areas to maintain their existing character and shall not improve these routes to a higher transportation standard*

g) Recreational Uses

- *Hunting, trapping and fishing*
 - *All are important NV outdoor traditions*
 - *Each is a critical tool, whether for wildlife/predator management and/or gathering research information on sage grouse*
- *Camping, OHVs, hiking, horseback and wildlife viewing*
 - *Each is important to allow public enjoyment of Nevada's wildlife and outdoors*
- *Temporary land closures or restrictions may be required for all*

III. PROPOSED STEADY LONG-TERM FUNDING STREAM REQUIRED TO ACCOMPLISH GOALS AND OBJECTIVES SET FORTH IN SECTIONS I AND II

A. PROPOSED FUNDING MECHANISM:

The funding needed to accomplish the level of habitat conservation and restoration necessary to halt the decline and promote sustainable sage-grouse populations far exceeds what has been proposed thus far in the discussion draft of the bill. We propose the following as a more comprehensive and effective funding strategy. A model similar to the Pittman-Robertson (P-R) Act allows federally collected funds to be utilized within states based upon a local match. As in the P-R model, we propose the USFWS administer and allocate funds for sage grouse protection and enhancement upon approval of proposals submitted by the State of Nevada either by NDOW or the State Sagebrush Ecosystem Council. Similarly, the Sage Grouse Initiative administered by the NRCS through the Farm Bill can provide needed funds to be utilized on both private and public land. Both of these models could be compatible with the State Sagebrush Ecosystem Council's proposed Conservation Credit System. This mechanism could include but not limited to:

- 1) **USFWS Administered Funding Sources**
 - a) *Sale of federal lands to mining, geothermal, and County interests contained within this bill*
 - b) **Land and Water Conservation Fund**
 - *An amount of at least twenty million dollars should be appropriated annually for sage grouse conservation in Nevada*
 - *These funds should not be diverted for any other purpose*
- 2) **NRCS Administered Funding Sources**

- a) U.S. Farm Bill**
- *An amount of at least ten million dollars should be appropriated annually for sage-grouse conservation in Nevada*
 - *Fund Sage Grouse Initiative projects*
 - *Fund willing-seller allotment purchase to be utilized as grass banks*
 - *Fund Incentives for grazing permit holders who meet forage objectives*
 - *Fund subsidies for voluntary temporary deferment or reduction of grazing on identified critical habitat in need of rest – similar to farming CRP program.*
- 3) The State of Nevada Sagebrush Ecosystem Council would establish a Sage Grouse Fund to be utilized as a match for federal dollars**
- a) Potential funding sources**
- *Revenues raised through the state sagebrush ecosystem mitigation bank*
 - *Revenues raised from mitigation for industrial activities in sage grouse habitat including mining, power line, pipeline, and road right of ways, energy development, and other human development*
 - *Revenues from Grazing Boards in those grazing board areas which encompass sage grouse habitat*
 - *Revenues generated through NDOW Upland Game Stamp and sage-grouse viewing stamp*
 - *Revenues raised from a percentage of OHV licensing program*
 - *Revenues from 10% of the state sales taxes levied on the purchase of outdoor equipment*
 - *Revenues from the State of Nevada General Fund equal to 10% of the total funds deposited in the proposed Sage Grouse Habitat Fund*
 - *Revenues from the Ruby Pipeline Mitigation Fund*
 - *Gifts, grants and donations from environmental organizations and wild horse advocacy organizations*
- 4) State matching requirements**
- a) *For the first 5 years after enactment of this legislation the state match will be limited to 10% of the total.***
- b) *Thereafter, the state match will increase to 25%.***
- 5) Authorization for disbursement and expenditure of revenues from the federal funds**
- a) *The USFWS and NRCS will authorize expenditures from the fund to the Nevada Sagebrush Ecosystem Council based on accepted grant applications from the State of Nevada.***
- b) *The Council will authorize expenditures of funds based upon concurrence and or recommendations by the Director of the Nevada Department of Wildlife, the Sagebrush Ecosystem Technical Team, and the State Director of the Bureau of Land Management (for work on BLM lands) and the Forest Supervisor of the Humboldt-Toiyabe National Forest (for work on USFS lands.)***
- 6) Reporting Requirements**
- a) *Annually the Sagebrush Ecosystem Council will report to the USFWS and NRCS on the projects initiated or accomplished and the amount of money expended on each project***
- b) *Copies of these reports will be submitted to the Nevada Office of the Governor, Nevada Department of Wildlife, Nevada Department of Conservation and Natural Resources, State Director of the Bureau of the Land Management, the Forest Supervisor of the Humboldt-Toiyabe National Forest and all other cooperating entities***

SUMMATION:

This proposal has outlined the three primary steps necessary to reverse the decline of sage-grouse and its habitat. To become successful, this will require the commitment of all stake holders which include land users and involved state and federal management agencies. This commitment extends well beyond “business as usual” and mandates change by all who live on, manage, use and love the land.

This proposal has been crafted to make “Doing the Right Thing” beneficial to rural economies and traditional lifestyles like ranching and outdoor recreation. We all rely on our national congressional delegation to craft the necessary legislation to transform these goals into reality. If Nevada sportsmen and NDOW had the resources to invest in retaining sagebrush habitat, we would not be facing the sage-grouse decline we have today. But the changes in land and weather, along with the impacts of current public land uses and interest in further development, are beyond the ability of sportsmen funding to address alone. To preserve the sage-grouse and Nevada's sagebrush landscape federal, state, and private interests must work together, be more effective, and access broader funding resources. We feel creation of “Sage Grouse Conservation Areas”, with the proposed funding sources, by congressional action will effectively address the issues required for success.

Thank you for your consideration.

Respectively submitted by *The Coalition for Nevada's Wildlife:*

Michael J. Bertoldi – Treasurer (Chairman of Coalition Sage Grouse Subcommittee)

Larry J. Johnson – President (also Director, Nevada Bighorns Unlimited – Reno)

Tom Smith – Vice President (also Director, Truckee River FlyFishers)

Stacy Trivitt – Director (also Director and Past President, Carson Valley Chukar Club)

Joel Blakeslee – Director (also President, Nevada Trappers Association)

Judi Caron – Director (also Director and Past President, Safari Club International, Northern Nevada Chapter)

Jim Puryear -- Director (also Member, Nevada Guides and Outfitters Association)

Bob Brunner – Director

Willie Molini – Director (also Director, Nevada Waterfowl Coalition)

Michael Cassidy – Director (also President, Safari Club International, Northern Nevada Chapter)

(See attachments Appendix A and Appendix B)

Also in Support of This Proposal:

Appendix A-COAL PROPOSAL FOR SAGE GROUSE CONSERVATION AND A NEW CONGRESSIONAL LAND DESIGNATION

“Specific Issues with the Current Applicable Public Land Designations”

A. Wilderness and WSA Designation (*Congressional*):

- 1) Protects land but is often detrimental to wildlife and habitat**
- 2) “Minimum tool” requirements hinder firefighting efforts**
- 3) “Minimum tool” requirements hinder restoration of burned areas**
- 4) Fire-resistant non-native species not allowed in green stripping to protect adjacent native unburned habitat**
- 5) Reluctance to permit new man-made water developments**
- 6) Reluctance to allow efficient maintenance of existing water developments**
- 7) Reluctance to permit beneficial man-made features such as fencing of wet meadows**
- 8) Difficulty in needed habitat improvements i.e. pinion-juniper chaining, control burns, spring development**
- 9) Waivers to restrictions, though available, are hard to get and seldom used**

B. ACEC Designation (*Administrative*):

- 1) Could have many of the desired management tools available**
- 2) Is administrative and subjective**
- 3) Can have inconsistent management of intent**
- 4) Can be amended and or removed in a new RMP process**
- 5) Lacks “Regulatory Certainty”**

Appendix B-COAL PROPOSAL FOR SAGE GROUSE CONSERVATION AND A NEW CONGRESSIONAL LAND DESIGNATION

**“Adaptive Management” as defined in the Nevada Rangeland
Monitoring Handbook, Second Edition - Educational Bulletin 06-03
as follows:**

ADAPTIVE MANAGEMENT (pg. 12/81)

Adaptive management (Appendix E) is the continual process of learning from our experiences and managing based on what we have learned. An acceptable plan should include a management program and a monitoring program needed to keep management on track, test assumptions, provide the information needed for future

planning, and guide rangeland managers. Adaptive management depends on flexibility. Management plans and monitoring methods flow from objectives. Cooperative monitoring (Appendix A) builds on the same principles as cooperative management. People who depend on public land should take particular interest in monitoring. It is the responsibility of the managing agency or landowner to modify the plan as needed in light of new information gathered through monitoring.

Monitoring methods should be selected to determine whether progress is being made toward achieving management objectives. And, to the extent it is not, why not. Objectives may focus management and monitoring on new questions, types of data, and/or interpretations. Because one change leads to another, monitoring methods used through time in the same way and at the same location gain value and develop significance. Keeping existing data, and periodically re-measuring and interpreting vegetation data using established methods on established plots, is extremely valuable for developing our understanding for rangeland management. Cited references describe the methods for many accepted monitoring techniques.

Once the monitoring data are collected, they must be analyzed along with other useful data and information. Analysis includes organizing, summarizing, and evaluating the information. This can include statistical analysis of data along with assessment of its validity and utility. Because it is often preferable to complete planning and monitoring using a collaborative

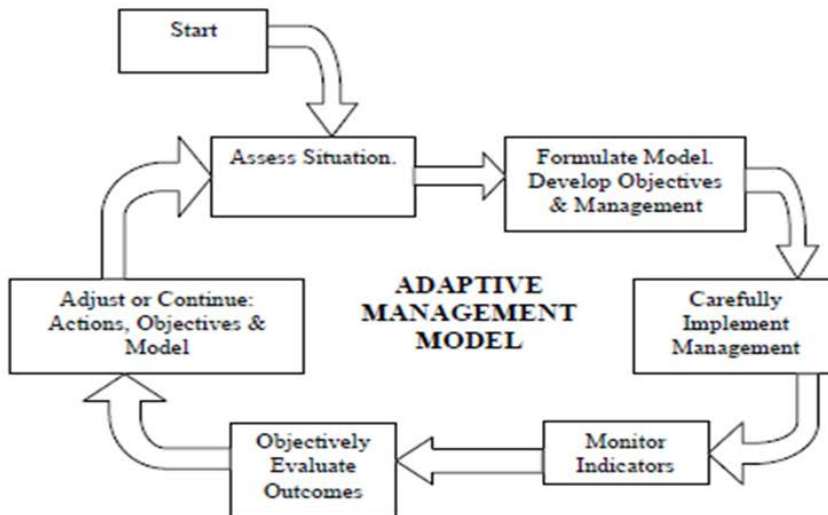
approach, analysis of monitoring data should also be done collaboratively. This is especially true if different people collect different parts of the whole data set. For example, if the permittee collects short-term monitoring data and agencies collect long-term data, collaborative analysis is preferred.

The result of the analysis is reaching conclusions about whether the objectives are being achieved or progress is being made toward the objectives. Additionally, conclusions must be reached about the causes of meeting or not meeting the objectives. Both kinds of conclusions are essential. Both must be thoroughly reasoned based on all the available information. For application to public lands, that rationale must be documented. The permittee should be included in discussions and development of the conclusions to better understand management practices and conditions for the particular site and season(s) of use.

The conclusions lead to a decision. To generalize, there are three possible decisions; continue existing management, change management, or change objectives. The first two choices are fairly self-explanatory. The third choice, change objectives, would be made when the information, analysis, and conclusions indicated that the objectives were not achievable, or the objectives did not actually relate to or were poor indicators of the identified issues, or the desired future conditions. Changing objectives is also appropriate when new planning sets new goals.

APPENDIX E - ADAPTIVE MANAGEMENT

At its most simplistic level, adaptive management is “learning by doing.” Continuous feedback and revision can make management increasingly effective, efficient, and accountable. Management and monitoring are designed in concert to achieve the objectives and optimize the information gained. Management is evaluated in light of this information and continued or revised based on progress toward the objectives. The following is a basic model of adaptive management. While there may be a beginning to successful adaptive management, there is not an end.



This model of adaptive management includes six steps.

- Assess the existing condition of the resources or values of interest.
- Formulate a model of the situation, develop objectives and management to achieve them. This is an important and potentially difficult step. The model is a conceptual description of the existing situation that identifies stressors or

impacts and how they affect the goals and objectives and explains how management actions will influence the stressors and modify the status of the objectives. To manage successfully we must ferret out these relationships. Just knowing that conditions are not meeting our expectations does not determine the causes, or identify what (if anything) can be changed to meet the objectives.

Almost without exception, every activity has the potential for positive and negative affects. Therefore, we must seek out the causes and effects. Not understanding these relationships often leads to a default solution of limiting some suspected activities.

- Carefully implement the management actions.
- Monitor indicators. The ecosystems, landscapes, and allotments we manage are complex. We cannot possibly monitor all attributes. The conceptual model helps identify indicators. Effective indicators respond in a manner that mirrors ecosystem dynamics, and responds to the applied management. Responses to management are measurable and can be differentiated from natural variability.
- Objectively evaluate the outcomes. The model is used to help evaluate the monitoring information. Typically by this step much time, effort, and thought has been invested. Participants tend to have ownership in the decisions. As a

result, it can be difficult to accept, or even recognize, results that suggest the management actions are not working, the objectives should be adjusted, or the model needs to be modified. The participants need to be continuously vigilant of such factors. Positive outcomes reinforce the model and objectives and provide data to support continuation of the management.

- Adjust or continue.
- Continue adaptive management.

A fundamental observation of successful adaptive management is that, not only do resource conditions improve, but the participants evolve and in unpredictable ways. This process often begins with the realization that our perceived understanding of the situation was imperfect and, as a result, we are not able to completely predict the outcomes of management. On-going monitoring, evaluating, and adapting brings increased knowledge and surprises. We have to expect and accept both.