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**STATE OF NEVADA**  
**Sagebrush Ecosystem Program**

**SAGEBRUSH ECOSYSTEM COUNCIL**  
**STAFF REPORT**  
**MEETING DATE: January 8 & 9, 2014**

**DATE:** January 3, 2014  
**TO:** Sagebrush Ecosystem Council Members  
**FROM:** Sagebrush Ecosystem Technical Team  
Telephone: 775-684-8600  
**THROUGH:** Tim Rubald, Program Manager  
Telephone: 775-684-8600, Email: timrubald@sagebrusheco.nv.gov  
**SUBJECT:** Discussion and consideration of draft Sagebrush Ecosystem Program comments to date on the BLM/USFS Nevada and Northeastern California Sub-Regional Greater Sage-Grouse Draft Land Use Plan Amendment (LUPA) and Environmental Impact Statement (DEIS).

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**SUMMARY**

This item presents draft comments to date, prepared by the SETT on the BLM/USFS Nevada and Northeastern California Sub-Regional Greater Sage-Grouse Draft LUPA/DEIS (hereafter DEIS) for SEC review, discussion, and consideration. The SETT has not finished their review of the DEIS and anticipate bringing additional comments to the SEC at the January 23, 2014 meeting. It is further anticipated the SEC will provide comments to the SETT on specific items to be considered and finalized for submission at the January 23, 2014 meeting.

The comments presented today are solely on the DEIS document itself and do not reflect SEC approved revisions to the State Alternative. The SETT is working with BLM/USFS staffs to incorporate those changes into the Final EIS.

**PREVIOUS ACTION**

**July 30, 2013.** The Council adopted the Sagebrush Ecosystem Strategic Detailed Timeline, which included review of the DEIS.

**November 18, 2013.** The Council directed the SETT to compile comments on the DEIS and submit them on behalf of the Sagebrush Ecosystem Program for the State.

**December 18, 2013.** The Council discussed possible comments to be developed on specific sections of the DEIS.

## **DISCUSSION**

On December 9, 2011, a Notice of Intent was published in the Federal Register to initiate the BLM/USFS Greater Sage-grouse Planning Strategy across ten western states. The BLM and USFS are preparing LUPAs with associated EISs for LUPs containing sage-grouse habitat range-wide. The BLM/USFS are pursuing this to respond to USFWS' March 2010 "warranted, but precluded" ESA listing petition decision for the greater sage-grouse. The USFWS identified inadequate regulatory mechanisms as one of the significant factors in their findings on the petition to list sage-grouse. The USFWS identified the principle regulatory mechanisms for the BLM/USFS to be conservation measures outlined in LUPs.

This agenda item addresses the DEIS for the Nevada and Northeastern California sub-region, one of 15 sub-regions currently undergoing the concurrent planning process for greater sage-grouse. The DEIS has six alternatives for analysis and consideration:

- Alternative A: No Action Alternative
- Alternative B: National Technical Team (NTT) Report Alternative
- Alternative C: Western Watershed Project Alternative
- Alternative D: BLM/USFS Agency Alternative (*currently the preferred alternative*)
- Alternative E: State of Nevada Alternative
- Alternative F: Wild Earth Guardians Alternative

This agenda item presents draft comments on the DEIS to date prepared by the SETT. The comments presented today are solely on the DEIS document itself and do not reflect SEC approved revisions to the State Alternative. The SETT is working with BLM/USFS staffs to incorporate those changes into the Final EIS. The SETT has yet to complete their review of the DEIS and anticipate bringing further developed comments back to the SEC at their January 23, 2014 meeting for final approval based on today's discussion. The SETT would welcome guidance from the SEC on the possible development of additional comments on specific items and direction on how to proceed with further development of the comments.

## **FISCAL IMPACT**

There is no fiscal impact at this time.

## **RECOMMENDATION**

Staff recommends the SEC discuss the comments prepared by the SETT and provide comments developed by the SEC in a workshop format. As well, the SETT would welcome additional direction on possible development of additional comments, on specific items to be considered by the SEC at their January 23, 2014 meeting.

## **POSSIBLE MOTION**

There is no proposed motion at this time.

## **Attachments:**

1. DRAFT Sagebrush Ecosystem Program Comments on the Nevada and Northeastern California Greater Sage-Grouse Draft LUPA and EIS.

**Nevada and Northeastern California Greater Sage-Grouse Draft LUPA and EIS  
Sagebrush Ecosystem Program Comments**

Ch/ App	Section	Page #	Text Referencing	Comment
Ex. Summary	ES.10.1	xxvi (xxxviii)	Alternative A: No Action	Reword to clarify: the sentence is currently worded as "...would develop new management actions <b>for to</b> protect ...." Suggest removing the word "for" and leaving the word "to".
Ex. Summary	ES.10.5	xxvii (xxxix)	Alternative E	replace "or" with "and" in "...avoid, minimize, <b>or</b> mitigate strategy..." This correction is obtained from the Nevada State Plan Section 3.1.2 Conservation Policies - "Avoid, Minimize, Mitigate"
Exec Sum		xxiv (xxxvi)	ES.8.5 Alternative E	The State disagrees that under Alt E, BLM-administered lands in California would be managed similar to Alt A (No Action). The State sees no logical reason why the goals, objectives, and management action for Alt E cannot be extended to BLM-administered lands in California.
Exec Sum		xxvii (xxxix)	ES.10.4 Alternative D; 2nd bullet	It is unclear why BLM would propose excluding all wind and solar energy development, while BLM is also proposing ROW avoidance for the planning area. Wind and solar energy development may not have negative impacts on GRSG in all areas mapped as habitat. The ROW avoidance policy would allow for the BLM to say no to wind and solar projects that would have negative impacts on GRSG and allow those that may have neutral impacts to proceed.
1	1.2	1-6 and 1-7 (6 and 7)	Table 1.1., 1.3,	The totals for PPH in these two tables are not the same. It is unclear why they are not the same. In addition the totals do not appear to be summed correctly for PGH and Total Acres in Table 1.1 or for PPH, PGH, and Total Acres in Table 1.3. Even if the sums are corrected they do not match between tables. This should be corrected or clarifying text should be provided.
1	1.2	1-7 (7)	Table 1.4.	The totals for PPH, PGH, and Total Acres in this table are equal to or greater than the values in Tables 1.1. and 1.3. Because this is just for BLM lands, and not for FS lands, it would be expected that these numbers would LESS than those in Tables 1.1 and 1.3. This should be corrected or clarifying text should be provided.

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Ch/ App	Section	Page #	Text Referencing	Comment
2	2.4.5	2-14 (46)	Alternative E section; 1st paragraph	The State disagrees that under Alt E, BLM-administered lands in California would be managed similar to Alt A (No Action). The State sees no logical reason why the goals, objectives, and management action for Alt E cannot be extended to BLM-administered lands in California.
2	2.5.2	2-18 (50)	"The BLM, Forest Service, and other conservation partners use the resulting information to guide implementation of conservation activities."	Second to last paragraph... unclear what "resulting information" is relating to. What information is this sentence referencing?
2	2.5.2	2-18 (50)	Starting with..."Standardization of monitoring methods and implementation"	The bottom three paragraph on this page are poorly written and unclear in what concept is to be conveyed. They are disconnected and the tense is not consistent in use.
2	2.5.2	2-19 (51)	"Indicators at the fine and site scales will be consistent with the Habitat Assessment Framework; however, the values for the indicators could be adjusted for regional conditions."	Habitat Assessment Framework - needs citation Stiver et al 2010 (this is already in the references section).
2	2.5.3	2-20 (52)	Starting with, " <b>Adaptive Management Plan</b> The BLM and Forest Service...."	It should be stated by when this adaptive management plan will be developed, written, and implemented.
2	2.5.3	2-20 (52)	Starting with, "The State of Nevada is updating a plan to provide more..."	The reference to State of Nevada monitoring and adaptive management plan is unclear in these two sentences. It states that the "BLM will evaluate this plan to the greatest extent possible" - Does this mean that the BLM intends to adopt it or that potentially the State of Nevada and the BLM may have separated Monitoring and Adaptive Management plans that may be different. Please provide clarification.
2	2.8.1	2-32 (64) and 2-41 (73)	On both pages, starting with, "In California, the BLM used a mapping method based ..."	This paragraph is repeated in part on these two pages. In addition, it is then unclear how this mapping method ties into the concept of PPH and PGH. Please provide further clarification.

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Ch/ App	Section	Page #	Text Referencing	Comment
2	2.8.2	2-50 (82)	"Sub-Objective D-SSS 3: —"	There is no Sub-objectives listed for Alt D, but seems that the Habitat Objectives Table, and the Monitoring Plan (Appdx E) and the Adaptive Management Plan that are part of this EIS would meet the same end. This Sub-objective should be updated.
2	2.8.2	2-89 (121)	Table 2.4; asterisk at bottom of table	The State disagrees that under Alt E, BLM-administered lands in California would be managed similar to Alt A (No Action). The State sees no logical reason why the goals, objectives, and management action for Alt E cannot be extended to BLM-administered lands in California.
2	2.8.2	2-93 (125)	Table 2.5; Action D-SSS-AM 2	Change to consult with NDOW and SETT
2	2.8.2	2-99 (131)	"Action D-SSS-AM 7: The agencies would coordinate with the Nevada Sagebrush Technical Team on all proposed disturbances within the state of Nevada to meet the mutual goal of no unmitigated loss."	This would be more appropriated categorized as D-SSS-MIT 3 which is currently "D-SSS-MIT 3: -". This action relates more to mitigation than to adaptive management and would then line up with Action E-SSS-MIT 7 which gets at no net loss as well.
2	2.8.2	2-100 (132)	Starting with, "Action D-SSS-AM 8: The BLM and Forest Service would coordinate with the Nevada Sagebrush..."	This would be more appropriately categorized as D-SSS-MIT 1, which is currently " D-SSS-MIT 1:-". This action relates more to mitigation than to adaptive management and would then line up with "Action E-SSS-MIT 1:..." which gets at the conservation credit system as well.
2	2.5	2-102 (134)	Action E-SSS-MIT 1: PMA-3	The phrases "Mitigation Bank Program" and "central mitigation bank" to be replaced with "Conservation Credit System"
2	2.5	2-105 (137)	Alternative E; TMA-21.1	The phrases "Mitigation Bank Program" and "central mitigation bank" to be replaced with "Conservation Credit System"
2	2.5	2-112 (142)	Action E-SSS-ACDM 4	change third bullet point from "...Mitigation Bank Program." to "...Conservation Credit System."

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Ch/ App	Section	Page #	Text Referencing	Comment
2	2.5	2-114 (144)	Alternative E	change second bullet point wording that currently reads as "...Mitigation Bank Program (PMA-3)..." to "...Conservation Credit System (PMA-3)..."
2	2.5	2-116 (146)	Alternative E	At the top of the column, replace "Mitigation Bank Program" with "Conservation Credit System"
2	2.5	2-122 (152)	Alternative E; TMA-21.1	in the first sentence of this section, replace "...Mitigation Bank Program..." with "...Conservation Credit System...". In the second sentence replace "...this central mitigation bank,..." with "...this state operated conservation credit system,..."
2	2.8.2	2-131 (163)	Table 2.5; Action D-VEG 19	What is BLM's justification for this management action? Provide a citation if this action is to remain in the alternative.
2	2.8.2	2-131 (163)	Table 2.5; Action D-VEG 20	Add to this action "unless grazing is part of the vegetation treatment design" to match the language in Action D-VEG 20.
2	2.8.2	2-131 (163)	Table 2.5; Action D-VEG 19 & 20	The State is greatly concerned about the implications of these management actions. Under this scenario, a permittee would not be allowed to graze their allotment for a total of three years if a vegetation treatment was to occur on their allotment. This may discourage permittees participating in vegetation treatments on their allotments. Taking into consideration that livestock grazing is the most widespread use of public lands in Nevada, this may severely limit the ability to accomplish much needed vegetation management treatments on the ground. It may also discourage permittees from participating in the Conservation Credit System, developed as part of the State Alternative and adopted by the BLM in the Agency Alternative. The State encourages the BLM to consider these implications when selecting the preferred plan.
2	2.8.2	2-168 (200)	Table 2.5; Action(A-F)-FFM-HFM-7	There are no actions listed in this row. Remove row.
2	2.8.2	2-173 (205)	Table 2.5; Action C-FFM-HFM 10	How is "good or better ecological condition" being defined here and what are the implications for management?

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2	2.8.2	2-181 (213)	Table 2.5; Action F-FFM-HFM 25	Does this action really propose constructing livestock enclosures (i.e. fencing) around post-fire recovery areas? Fires in Nevada can burn in excess of hundreds of thousands of acres. If this is selected then fencing would have to be constructed around these massive burn areas? Who would pay for this? Putting up so much additional fencing would lead to increased strike risk and could negatively impact GRSG populations. This is impractical for actual implementation.
2	2.8.2	2-182 (214)	Table 2.5; Action C-FFM-HFM 28	Clarification is needed on this action. Does this exclude other treatment methods or other existing vegetation in regards to fuels reductions treatments?
2	2.8.2	2-195 (227)	Table 2.5; Action D-LG 2	Why does these management action only apply to nesting habitat? What will the BLM do for brood rearing and winter habitat?
2	2.8.2	2-196 (228)	Table 2.5; Action D-LG 4	What does the term "future management applications" mean in this context? This is too broad and leaves open to interpretation and inconsistent application across BLM districts. The BLM should add more specificity or eliminate this action
2	2.8.2	2-214 (246)	Table 2.5; Action D-LG-D 1	What does the term "appropriate changes" mean? This is too broad and leaves open to interpretation and inconsistent application across BLM districts. The BLM should add more specificity or eliminate this action.
2	2.8.2	2-215 (247)	Table 2.5; Action D-REC 2	Is there scientific literature on the effects on sage-grouse from low-impact recreational activities such as hiking and camping? It is not mentioned in the NTT report. The BLM should have a scientific basis for proposing such a draconian management action, such as not allowing new recreational facilities in all PPMAs and PGMAs. If the BLM does not have scientific justification, then it should be eliminated from consideration in the final plan, particularly since it conflicts with the BLM's multiple-use mandate.

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Ch/ App	Section	Page #	Text Referencing	Comment
2	2.5	2-228 (258)	Action E-LR-LUA 7: TMA-9.3:	Suggest removing of last sentence in this section. It appears redundant.
2	2.5	2-176 (312)	Action E-LR-LUA 7: TMA-9.3:	Suggest removing of last sentence in this section. It appears redundant.
2	2.8	2-228 (364)	Alternative E	Replace "...Mitigation Bank Program." with " ...Conservation Credit System." This is found in the first sentence in column labeled Alternative E.
2	2.8.2	2-268 (300) - 2-322 (354)	Table 2.5	This section on the table is repeated. Eliminate from final version
2	2.8.2	2-322 (354)	Table 2.5; asterisk at bottom of table	The State disagrees that under Alt E, BLM-administered lands in California would be managed similar to Alt A (No Action). The State sees no logical reason why the goals, objectives, and management action for Alt E cannot be extended to BLM-administered lands in California.
4	4.3.1	4-13 (605)	Third bullet. (VDDT is first presented in Chapter 3 p 3-26 but provides no real explanation.)	I was unable to find detailed methods and output on the VDDT modeling. As this modeling effort is critical to the analysis and conclusions reached in Chapter 4, additional detail should be provided to assure transparency of information and so that the reader can more easily understand what the VDDT modeling is, how it "works", and how conclusions were reached.
4	4.3.1	4-13 (605)	8th bullet starting with "Short-term impacts..."	How did BLM arrive at the conclusion that short-term impacts are up to ten years and long-term impacts exceed ten years. This seems arbitrary. Please include a citation or justification if this is to remain in the document.

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4	4.3.1	4-13 (605)	9th bullet starting with " Because GRSG are highly..."	The first part of this sentence is scientifically accurate but the conclusion is a faulty and misguided assumption to base the analysis of the alternatives on. What type of "disturbances" are being referred to here? A vegetation manipulation project can be considered a disturbance but is proposed throughout the BLM and other alternatives. What type of "protections" are being referred to here? This is unclear and may lead to an underlying faulty analysis of the alternatives.
4	4.3.2	4-15 (607)	Livestock Grazing Management subsection	The effects of livestock grazing are being misrepresented in this section. Livestock grazing can have a not only a negative effect on sage-grouse and their habitat, but also a neutral or positive effect as well. This extends far beyond reducing fuel loads as is suggested here. The statement that "grazing restrictions" only will enhance GRSG habitat and sagebrush ecosystem health is misleading and does not fully capture the breath of published peer-reviewed scientific literature on this matter. Please refer to the literature synthesis on this subject: Davies et al (2001) titled "Saving the sagebrush sea: An ecosystem Conservation plan for big sagebrush plant communities". Biological Conservation. 144: 2573-2584.
4	4.3.2	4-16 (608)	2nd paragraph; 3rd sentence	This statement needs a citation
4	4.3.2	4-18 (610)	Land Uses and Realty Management subsection	The BLM states here that "exclusion areas may result in more widespread development on private lands if government management lands could not be used", yet the BLM's own alternative proposes extensive exclusion areas (all PPMAs and PGMA's) for new recreational facilities, utility-scale wind and solar energy facilities, salable mineral development, and non-energy leasing minerals. This is an inconsistency that BLM should consider when selecting their preferred plan.

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Ch/ App	Section	Page #	Text Referencing	Comment
4	4.3.2	4-20 (612)	Comprehensive Travel and Transportation Management subsection; 1st paragraph; last sentence	This statement needs a citation
4	4.3.8	4-44 (636)	1st paragraph; last sentence	Alt E does not limit habitat disturbances to not more than five percent per year, per SGMA, unless habitat treatment show credible positive results. Please refer to the letter submitted to BLM/ USFS dated July 1, 2013 as part of the ADEIS review. Please strike mention on this anywhere it appears throughout the document.
4	4.3.8	4-45 (637)	Table 4.25	Table 4.25; 4.26, and 4.27 essentially convey the same information and do not need to be repeated three times.
4	4.3.8	4-44 (637)	Impacts from Vegetation and Soils Management subsection; 1st paragraph; 1st sentence	The State disagrees that under Alt E, BLM-administered lands in California would be managed similar to Alt A (No Action). The State sees no logical reason why the goals, objectives, and management action for Alt E cannot be extended to BLM-administered lands in California.
4	4.3.8	4-45 (637)	Table 4.25	The citation "BLM and Forest Service 2013" is not in the References Section. However, there is a "BLM and Forest Service GIS 2013" which may be the correct citation. Please either add it or correct it.
4	4.3.8	4-46 (638)	Impacts from Leasable Minerals Management subsection; 1st paragraph; 2nd sentence	Alt E does not include NSO stipulations
4	4.3.8	4-47 (639)	Impacts from Leasable Minerals Management subsection	It is unclear what the findings of this subsection are.
4	4.3.8	4-47 (639)	Impacts from Salable Minerals Management subsection; 1st paragraph; 2nd sentence	Alt E does not limit habitat disturbances to not more than five percent per year, per SGMA, unless habitat treatment show credible positive results. Please see previous comments.
4	4.3.8	4-47 (639)	Impacts from Salable Minerals Management subsection	It is unclear what the findings of this subsection are

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4	4.3.8	4-48 (640)	Impacts from Land Uses and Realty Management subsection; 1st paragraph	Alt E does not limit habitat disturbances to not more than five percent per year, per SGMA, unless habitat treatment show credible positive results. Please see previous comments.
4	4.3.8	4-48 (640)	Impacts from Land Uses and Realty Management subsection; last sentence	The State disagrees that Alt E is similar to Alt A in this instance and would provide few regulatory mechanisms to reduces impacts to GRSG. Alt E's avoid, minimize, mitigate policy is equivalent to a ROW avoidance. The State respectfully requests the BLM reconsiders the analysis of this subsection.
4	4.3.8	4-48 (640)	Impacts from Renewable Energy Management; last sentence	The State disagrees that there would be <u>more</u> wind and solar energy development under Alt E than Alt A. The State requests clarification on how BLM arrived at this conclusion.
4	4.4.8	4-69 (661)	Impacts from Vegetation and Soil subsection; sentence starting with, "However, this alternative would limit..."	Alt E does not limit habitat disturbances to not more than five percent per year, per SGMA, unless habitat treatment show credible positive results. Please see previous comments.
4	4.4.8	4-70 (662)	1st paragraph; sentence starting, "The dominance of cheatgrass..."	The BLM states here that the dominance of cheatgrass and medusa head cannot be rectified by simply removing cattle or by reducing their numbers. However, the BLM's alternative relies heavily on adjusting allowable use levels when allotments are not meeting GRSG habitat objectives (Table 2.6). By the same token, the BLM is considering two alternatives that would either eliminate grazing from public lands completely or reduce it by 25%. The BLM should carefully consider their own words stated here when selecting their preferred plan for livestock grazing.
4	4.4.8	4-70 (662)	Impacts from Wild Horse and Burro Management subsection	The State disagrees that Alt E for wild horse and burro management is the same as Alt A. Alt E proposes goals, objectives, and management actions that emphasize impacts to GRSG and their habitat in wild horse and burro management.
4	4.4.8	4-71 (663)	Impacts from Locatable and Salable Minerals Management subsection	Alt E's goal for no net loss of GRSG habitat and the Conservation Credit System needs to be included in the analysis of this section.

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Ch/ App	Section	Page #	Text Referencing	Comment
4	4.4.8	4-71 (663)	Impacts from Land Uses and Realty Management subsection	Alt E's goal for no net loss of GRSG habitat and the Conservation Credit System needs to be included in the analysis of this section.
4	4.4.8	4-71 (663)	Impacts from Renewable Energy Management subsection	Alt E's goal for no net loss of GRSG habitat and the Conservation Credit System needs to be included in the analysis of this section.
4	4.5.8	4-91 (683)	Impacts from Wild Horse and Burro Management subsection	The State disagrees that Alt E would be equivalent to Alt A (no action.) The State contends that Alt E would be similar to Alt D in this instance.
4	4.5.8	4-92 (684)	1st sentence	Alt E does not limit habitat disturbances to not more than five percent per year, per SGMA, unless habitat treatment show credible positive results. Please see previous comments.
4	4.5.8	4-92 (684)	Impacts from Land Uses and Realty Management subsection	Alt E's policy of avoid, minimize, mitigate is equivalent to ROW avoidance.
4	4.8.8	4-125 (717)	1st paragraph; 1st sentence	The State disagrees that under Alt E, BLM-administered lands in California would be managed similar to Alt A (No Action). The State sees no logical reason why the goals, objectives, and management action for Alt E cannot be extended to BLM-administered lands in California.
4	4.8.8	4-126 (718)	Impacts from Livestock Grazing Management subsection	The State disagrees that Alt E would be the same as Alt A in this instance. Please refer to TMA-12 of the State Alternative originally submitted to the BLM. This provides for the use of livestock grazing for fuels reduction.
4	4.9.8	4-148 (740)	last paragraph; last sentence; "Alternative E does not contain the BLM regulatory mechanism."	The State requests clarification on what exactly "the BLM regulatory mechanism" is.
4	4.12.8	4-170 (762)	Impacts from Lands Uses and Realty subsection	Alt E also includes an objective of no net loss of GRSG habitat and is similar to ROW avoidance. This needs to be considered in the analysis.

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7		7-39 (955)	"Epanchin-Niell, R. S., M. B. Hufford, C. E. Aslan, J. P. Sexton, J. D. Port, and T. M. Waring. 2009. "Controlling invasive species in complex social landscapes." Front. Ecol. Environ. doi:10.1890/090029."	This citation is not correct- it is a paper on yellow star thistle. The intended citation is likely: "Epanchin-Niell, R., J. Englin, and D. Nalle. 2009. Investing in rangeland restoration in the Arid West, USA: Countering the effects of an invasive weed on the long-term fire cycle. Journal of Environmental Management 91:370-379."

DRAFT