

The following links and/or pages are support for agenda
item 6

Proposed 2018 NACO Budget - Approved by the NACO Board **/**/17

REVENUES

Unreserved Fund Balance	\$61,602
Membership Dues	\$352,846
Public Lands Assessment	\$130,924
Associate Membership	\$16,520
Conference Revenue	\$88,192
IAF/Supplemental Contract	\$70,000
Interest & Investment Income	\$15,000
Transfers from Investments	\$0
National Programs	\$11,000
Equipment & Vehicle Reserve	\$110,468
Vacation Leave Reserve	\$35,291
Total	\$891,843

EXPENSES

Staff Salaries	\$305,857
Benefits	
PERS	\$85,640
Health/Dental/Vision/Life Insurance	\$39,366
Workers Comp/FICA	\$5,500
Audit	\$8,400
Board Meetings	\$10,000
Conference Expenses	\$45,000
Donations/Sponsorships	\$1,500
Equipment Lease & Maintenance	\$7,522
Equipment Purchases	\$4,500
County Leadership Institute	\$2,200
Legislative Expenses	\$3,000
Liability & Auto Insurance	\$5,040
Office Supplies	\$3,500
Postage	\$500
Printing	\$1,000
Professional Services	\$17,142
PEHB Liability	\$1,552
Building Operating Expenses	\$18,403
Building Capital Projects	\$6,000
Publications/Dues/Professional Fees	\$7,743
Telephone	\$13,200
Video-Conferencing Hosting & Warranty	\$9,528
Staff Travel	\$20,000
Representative Travel	\$15,000
Special Studies & Litigation	\$15,000
Vehicle Registration Maintenance	\$3,000
WIR Dues	\$9,991
Equipment & Vehicle Reserve	\$110,468
Vacation Leave Reserve	\$35,291
Unreserved Fund Balance	\$81,000
Total	\$891,843

PROPOSED 2018 BUDGET DESCRIPTION

NACO REVENUES

UNRESERVED FUND BALANCE: The unreserved fund balance is projected to be \$61,602 which represents the projected carry forward from 2017. The unreserved fund balance projected for 2016 was \$43,000.

MEMBERSHIP DUES: The 2018 NACO dues for all counties are calculated to be a total of \$352,846. The 2017 dues were \$349,552. The NACO Dues Schedule was developed to recognize the various unique characteristics of each county, while at the same time providing a systematic method of assessment that considers the changes occurring yearly in our member county revenues. As such, the 2018 dues are based upon the FY 16 audited S-1 revenues for each county and the 2016 certified population figures. The 2018 dues for two counties decreased by more than 10% each based on lower revenues.

PUBLIC LANDS ASSESSMENT: The NACO Bylaws were approved at the November 16, 2016 Membership meeting to include a new revenue which is based on a percentage, as determined by the Board to apply to all counties, equivalent to the most recent federal Payment in Lieu of Taxes (PILT) payment made to each county not to exceed 0.5%. The Assessment for 2018 is based on 0.5%.

ASSOCIATE MEMBERSHIPS: \$16,520 is anticipated as revenue from associate members. The 2017 actual is \$15,000.

CONFERENCE REVENUE: \$88,192 is anticipated for 2018, this is \$10,000 more than the actual amount for 2017.

INDIGENT ACCIDENT FUND/ SUPPLEMENTAL FUND: \$70,000 is budgeted by NACO for administration of the Indigent Accident Fund, this amount was increased by \$10,000 during the 2017 Legislative Session. The current contract extends through June 2019.

INTEREST INCOME: \$15,000 has been budgeted for investments that are managed by Raymond James Financial Advisors which is \$2,752 less than the amount budgeted for 2017. The interest received this year has decreased from what was projected.

TRANSFER FROM INVESTMENTS: There are no transfers from investments for 2017. In past years transfers from investments have been made for large capital improvements, as approved by the NACO Board.

NATIONAL PROGRAMS: Through agreements entered into by the Board, the Association receives revenue from NACo for marketing the U.S. Communities Program, Nationwide Retirement Services (deferred compensation) and the Caremark Discount Prescription Card Program. The Association also receives royalties based on county participation in the U.S. Communities Program and Nationwide Retirement Services as well as constituent use of the Caremark Discount Prescription Card. We anticipate receiving \$11,000 in revenue for participation in these national programs, the same as in 2017. NACO can generate additional revenue as well as savings for counties by increasing the use of the national programs.

EQUIPMENT AND VEHICLE RESERVE: \$110,468 is allocated for NACO's equipment, vehicle reserve fund, and building and is based on straight-line depreciation. The total accumulated depreciation as determined by the independent auditor is \$262,001, an increase of \$34,890 over the most recent audited fiscal year (2016).

VACATION AND SICK LEAVE RESERVE: \$35,291 is the potential accrued vacation and sick leave liability for all NACO staff. This is currently an unbudgeted liability.

NACO EXPENSES

STAFF SALARIES AND BENEFITS: The 2018 budget calls for continuing with a full-time NACO staff of four: Executive Director, Deputy Director, Office Manager and Public Lands and Natural Resources Director. Salaries for NACO employees are \$305,857 which includes a 3% salary increase for the Office Manager and an 9% increase for the Public Lands and Natural Resources Director effective January 1, 2017. Total staff salaries are below the 2017 budgeted amount; however, a comprehensive review of the Office Manager's job description compared to current responsibilities will be conducted in 2018, and may warrant an additional salary increase. Office Manager salary will be brought before the NACO Board again in 2018. All employees are members of the employer funded Public Employees Retirement System. The PERS contribution rate is currently 28.00%. NACO employees are also provided life insurance, health, dental and vision insurance. The 2018 budget reflects an expected additional increase in health insurance costs. The Workers' Compensation is provided under the Public Agency Insurance Pool.

AUDIT: \$8,400 is budgeted for our independent auditor, Michael Bertrand, to conduct the 2018 NACO Audit. The actual amount for 2016 was \$8,325, and for 2017 was \$7,225.

BOARD MEETINGS: \$10,000 is allocated for the 2018 Board meetings, this is an increase of \$6,000 over 2017 and includes the estimated cost of staff travel to two meetings in Clark County.

CONFERENCE EXPENSE: \$45,000 is allocated for the 2016 NACO Annual Conference which is to be held in Minden, Douglas County in November. This is \$2,600 more than what was budgeted in 2017.

DONATIONS/SPONSORSHIPS: \$1,500 is being proposed for donations during 2017 to support other groups affiliated with the mission of NACO. This is the same as last year.

EQUIPMENT LEASES AND MAINTENANCE: \$7,522 is allocated for office equipment leases and maintenance. This figure represents the lease of a copier, scanner and fax machine, as well as maintenance costs for equipment, and is the same amount budgeted for 2017.

EQUIPMENT PURCHASES AND SYSTEM MAINTENANCE: \$4,500 is allocated for computer and other office equipment. This is the same amount that was budgeted for 2017.

COUNTY LEADERSHIP INSTITUTE: \$2,200 is allocated in 2018 to support attendance for one participant in the National Association of Counties Leadership Institute training program.

LEGISLATIVE EXPENSES: \$3,000 is requested for legislative expenses during 2018 to support active dialogue with members of the legislature and lobbying team efforts on behalf of the membership. This is the same amount that was budgeted in previous years.

LIABILITY AND AUTO INSURANCE: NACO is a member of the Nevada Public Agency Insurance Pool. \$5,040 is allocated for general liability for the office and NACO vehicle, an increase of \$840.

OFFICE SUPPLIES: \$3,500 is allocated for office supplies, which is the same amount budgeted for 2017.

POSTAGE: \$500 is allocated for postage, which is \$75 less than budgeted last year.

PRINTING: \$1,000 is allocated for general printing, the same as budgeted last year.

PROFESSIONAL SERVICES: \$17,142 has been allocated to pay for professional services during the year. This includes payroll processing, bookkeeping services and IT services. This is the same amount budgeted as last year.

PEHB LIABILITY: \$1,552 has been budgeted for the prorated subsidy for a former NACO employee who has retired from the State and is currently receiving Public Employee's Health Benefits. This is an increase of \$100 over the last year.

BUILDING OPERATING EXPENSES: \$18,403 is budgeted for taxes, utilities, landscaping/snow removal, janitorial services, and minor maintenance and repair. This is the same amount budgeted in 2017.

BUILDING CAPITAL IMPROVEMENT PROGRAM: \$6,000 is budgeted for minor improvements and repairs such as painting, window glazing, roof repairs etc. and is the same as last year.

PUBLICATIONS/DUES/REGISTRATION FEES: \$7,743 is allocated for newspapers and magazine subscriptions, membership dues in other organizations and registration fees to outside conferences and meetings. This includes costs for legal research subscriptions and legal fees and includes an increase of \$924 for 2018.

TELEPHONE: \$13,200 is allocated for telephone expenses, internet, and cell phones for NACO staff. This is the same amount as budgeted for 2017.

VIDEO-CONFERENCE HOSTING & WARRRANTY: \$9,528 is budgeted for the operation and maintenance of NACO's video-conferencing system, the same as 2016.

STAFF TRAVEL: \$20,000 is allocated for NACO travel for 2018, the same as 2017. It includes travel to the NACo Legislative Conference, the NACo Annual Conference, the annual NCCAE meeting, and any other travel that may be required of the NACO staff in the course of carrying out the mission of NACO, including visiting and serving our membership on site.

REPRESENTATIVE TRAVEL: \$15,000 is allocated for the NACO President, NACo and WIR Board members and other NACO Board members for travel pursuant to NACO's travel policy. This is the same amount that was budgeted for 2017.

SPECIAL STUDIES AND LITIGATION: \$15,000 is allocated for special studies including but not limited to technical studies related to legislative issues and legal research and litigation.

VEHICLE REGISTRATION AND MAINTENANCE: \$3,000 is budgeted for 2018, the same as 2017.

W.I.R. DUES: \$9,991 is budgeted for WIR annual dues for 2017.

EQUIPMENT RESERVE & BUILDING DEPRECIATION: \$110,468 is allocated for equipment reserve. The total accumulated depreciation as determined by the independent auditor, for both equipment and building depreciation is \$262,001. The audited cost for replacement of furniture and equipment is \$173,614.

VACATION/SICK LEAVE RESERVE: \$35,291 is the accrued vacation and sick leave liability. This is an unbudgeted liability.

UNRESERVED FUND BALANCE: \$81,000 is estimated for 2018, which is 9%.

County	Revenue Component		Population Component ⁽¹⁾			PILT Component		2018 Dues ⁽²⁾	2017 Dues	Change
	FY 16 Audited Revenues	Base Assessment	2016 Certified Population	Per Capita Assessment	Population Assessment	2017 County PILT Payment	PILT Assessment (0.5%)			
Carson City	\$93,291,218	\$21,500	55,182	0.06	\$3,311	\$109,045	\$545	\$25,356	\$25,292	\$64
Churchill	\$27,976,850	\$13,000	25,266	0.08	\$2,021	\$2,260,796	\$11,304	\$26,325	\$26,077	\$248
Clark	\$3,028,444,032	\$24,500	2,166,181	0.03	\$64,985	\$3,457,840	\$17,289	\$106,775	\$104,897	\$1,878
Douglas	\$78,138,727	\$21,500	48,235	0.08	\$3,859	\$671,200	\$3,356	\$28,715	\$28,645	\$70
Elko	\$48,781,612	\$15,500	53,997	0.06	\$3,240	\$3,559,616	\$17,798	\$36,538	\$36,141	\$397
Esmeralda	\$5,596,482	\$6,500	964	0.15	\$145	\$148,090	\$740	\$7,385	\$5,357	\$2,028
Eureka	\$18,034,551	\$10,500	1,959	0.15	\$294	\$360,133	\$1,801	\$12,595	\$15,044	-\$2,450
Humboldt	\$30,193,042	\$13,000	16,853	0.1	\$1,685	\$1,766,335	\$8,832	\$23,517	\$23,353	\$164
Lander	\$25,752,241	\$13,000	6,257	0.12	\$751	\$1,003,801	\$5,019	\$18,770	\$21,164	-\$2,394
Lincoln	\$10,923,467	\$8,500	5,057	0.12	\$607	\$893,189	\$4,466	\$13,573	\$13,484	\$89
Lyon	\$45,138,271	\$15,500	53,644	0.06	\$3,219	\$2,148,161	\$10,741	\$29,459	\$29,155	\$305
Mineral	\$9,636,388	\$6,500	4,578	0.15	\$687	\$714,477	\$3,572	\$10,759	\$10,703	\$56
Nye	\$51,889,711	\$18,000	45,737	0.08	\$3,659	\$3,153,811	\$15,769	\$37,428	\$37,227	\$201
Pershing	\$12,959,091	\$8,500	6,693	0.12	\$803	\$1,102,628	\$5,513	\$14,816	\$12,708	\$2,108
Storey	\$17,377,340	\$10,500	4,043	0.15	\$606	\$38,392	\$192	\$11,298	\$11,286	\$13
Washoe	\$452,204,933	\$24,500	448,316	0.04	\$17,933	\$3,547,161	\$17,736	\$60,168	\$59,533	\$636
White Pine	\$20,896,222	\$13,000	10,413	0.1	\$1,041	\$1,250,115	\$6,251	\$20,292	\$17,654	\$2,638
Total		\$244,000	2,953,375		\$108,846	\$26,184,790	\$130,924	\$483,769	\$477,718	\$6,051

(1) Certified by Governor; provided by the State of Nevada Demographer

(2) 2018 Dues = Base Assessment + (2016 Population X Per Capita Assessment) + (2017 County PILT Payment X PILT Assessment)

The following links and/or pages are support for agenda
item 11c



Nevada Association of Counties

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Carson, City, NV 89703

775-883-7863

www.nvnaco.org

October 17, 2016

Public Comments Processing

Attn: Docket No. FWS-HQ-ES-2015-0165

Division of Policy, Performance and Management Programs MS: BPHC

U.S. Fish and Wildlife Service

5275 Leesburg Pike

Falls Church, VA 22041-3803

Submitted via Federal eRulemaking Portal: <http://www.regulations.gov>

Re: Public Comment on the USFWS “Endangered and Threatened Wildlife and Plants; Endangered Species Act Compensatory Mitigation Policy; Notice” at 81 Fed. Reg. 61032 (Sept. 2, 2016)

The Nevada Association of Counties (NACO) hereby submits this comment letter on the U.S. Fish and Wildlife Service's (FWS) proposed Endangered Species Act (ESA) Compensatory Mitigation Policy. This comment letter is a response to the Notice published in the Federal Register at 81 Fed. Reg. 61032 on September 2, 2016.

The following points highlight concerns and needs as well as recommendations for resolution, in no particular order:

1. The Service should clearly describe its existing authorities and distinguish between what it can require and what it can only recommend. The three directives cited at 81 Fed. Reg. 61033 direct agencies on mitigation standards only to the extent allowable by their implementing statutes.¹ The FWS may not use the NEPA process to compel the adoption of additional conditions on an ESA permit applicant.² The FWS acknowledges the requirement for a net conservation benefit exceeds agency authority under the ESA.³

¹ Presidential Memorandum: Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment, 80 Fed. Reg. 68743 (Nov. 6, 2015); Improving Mitigation Policies and Practices of the Department of the Interior, Secretarial Order 3330 (October 31, 2013); A Strategy for Improving the Mitigation Policies and Practices of the Department of the Interior, (Clement et al. 2014).

² *Natural Res. Def. Council, Inc. v. U.S. EPA*, 822 F.2d 104, 127 (D.C. Cir. 1987) (EPA I) (citations omitted) (“NEPA, as a procedural device, does not work a broadening of the agency's substantive powers”); *Natural Res. Def. Council, Inc. v. U.S.*

2. For what the FWS can only recommend, it should encourage and fund local conservation efforts and forge better partnerships with State and local governments to holistically accomplish these goals.
3. It is unclear how "Compensatory Mitigation" differs from "Mitigation" or "Conservation Efforts" when At-Risk Species and pre-listing efforts are being included within its application.⁴ Compensatory Mitigation seems to apply only to mitigation measures adopted under Section 7 and 10 of the ESA once a species has already been listed and to offset impacts from a particular project. Efforts for At-Risk Species, however, are broader; as the goal of the ESA is to conserve species such that they do not need to be on any list. Yet there is no discussion in this policy regarding how "Conservation Efforts" and the FWS's Policy for Evaluation of Conservation Efforts (PECE) Policy fit into the larger conservation and mitigation picture. This includes discussions regarding advance mitigation and additionality. To support these positive incentives, for example, additionality must account for previously planned conservation efforts.
4. It is unclear how "priority conservation areas" will be identified, by which agency within the Department of Interior, under which authorities, and whether those areas qualify under the ESA as offsetting the impacts to a particular species at issue in a take permit.
5. The Service should explain how it will address critical habitat restoration requirements within landscape level compensatory mitigation. For example, if a project proponent contributes to a landscape-level in-lieu fee program, those funds may be directed towards the restoration of non-critical habitat portions of a "priority conservation area". In this scenario, landscape level compensatory mitigation may adversely affect a listed species because there is no guarantee those contributions or resources will be used to offset the project proponent's impacts to the critical habitat of that impacted species.
6. The FWS proposed policy of allowing the enhancement or restoration of public lands as a form of stakeholder agreed upon compensatory mitigation, including for projects with impacts that do not occur on public lands, should require the public land manager to commit to providing long-term protection and management of compensatory mitigation occurring on public lands. Further, the Service should require the public land manager to implement and fully fund alternative compensatory mitigation in the event that there is a change in law that allows incompatible uses to occur on mitigation lands. If the land is outside of critical habitat, there is no trigger for consultation.
7. The FWS should ensure that the policy preserves flexibility to apply the various approaches and mechanisms currently being used to accomplish compensatory mitigation in a way that does not inadvertently reduce local innovation and enthusiasm.
8. In lieu fee mitigation should help fund local conservation efforts through a grant program.

EPA, 859 F.2d 156, 169 (D.C. Cir. 1988) (EPA II) (citations omitted) ("NEPA does not, however, expand the range of final decisions an agency is authorized to make); *South Coast Air Quality Management District v. FERC* 621 F.3d 1085 (9th Cir. 2010) ("... NEPA may not be used to broaden [the federal agency's] congressionally limited role").

³ "This policy is focused on compensatory mitigation that can be achieved under the ESA. The Service's authority to require mitigation is limited, and our authority to require a 'net gain' in the status of listed or at-risk species has little or no application under the ESA." 81 Fed. Reg. 61034-5.

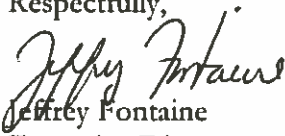
⁴ 81 Fed. Reg. 61032.



9. To address potential concerns that the advance mitigation approach is pre-decisional, the policy could provide that “Points of Tentative Agreement” and “Mitigation Credit Letters” may be revisited if information received during public comment indicates that there was a mistake such that the conservation opportunity is actually not suitable compensatory mitigation.
10. The mitigation policy should adopt an approach similar to that taken in the Section 10 of the Handbook to identify exceptions to the requirement to mitigate in advance of impacts.

Thank you for your time and consideration of NACO’s comments. NACO supports the comments provided by the Clark County Desert Conservation Program- Multiple Species Habitat Conservation Plan, the State of Nevada, and the National Association of Counties. All of Nevada’s counties are important stakeholders that will potentially be affected by this proposed change in policy. We look forward to a final policy that provides project proponents with increased certainty and that contains flexibility to leverage the benefits that can be obtained through regional compensatory mitigation approaches.

Respectfully,



Jeffrey Fontaine
Executive Director
JF/ts
Cc: file





Nevada Association of Counties

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May 9, 2016

Public Comments Processing

Attn: Docket No. FWS-HQ-ES-2015-0126

Division of Policy, Performance, and Management

U.S. Fish and Wildlife Service

5275 Leesburg Pike, ABHC-PPM

Falls Church, Virginia 22041-3803

Via eRulemaking Portal: <https://www.regulations.gov/#!docketDetail;D=FWS-HQ-ES-2015-0126>

Re: Proposed Revisions to the U.S. Fish and Wildlife Service Mitigation Policy (81 F.R. 12380)

The Nevada Association of Counties (“NACO”) hereby submits this comment letter on the U.S. Fish and Wildlife Service’s (FWS) proposed revisions to its mitigation policy. This comment letter is a response to the Notice published in the Federal Register at 81 F.R. 12380 on March 8, 2016. The draft policy departs significantly from existing policy and practices under the Endangered Species Act (ESA). Specifically, the policy emphasizes avoidance as the preferred form of mitigation and further establishes a “net benefit” or “no net loss” standard for mitigation. The following points highlight concerns with the draft policy as well as recommendations for resolution:

- The Service should continue to exclude application of the mitigation policy to the ESA and consolidate all ESA policies into the ESA-specific policy document that is currently under development.
- To improve clarity, the Service should clearly describe its existing authorities and distinguish between what it can require and what it can only recommend. The recent Presidential Memorandum issued on November 5, 2015 directs agencies on mitigation standards only to the extent allowable by their implementing statutes.¹ If a federal agency lacks the statutory authority to require certain conditions of a permit applicant, it may not, for example, use the NEPA process to compel the adoption of such conditions.²

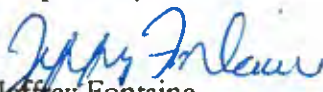
¹ Presidential Memorandum: Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment. 80 Fed. Reg. 68743 (Nov. 6, 2015).

² *Natural Res. Def. Council, Inc. v. U.S. EPA*, 822 F.2d 104, 127 (D.C. Cir. 1987) (EPA I) (citations omitted) (“NEPA, as a procedural device, does not work a broadening of the agency’s substantive powers”); *Natural Res. Def. Council, Inc. v. U.S. EPA*, 859 F.2d 156, 169 (D.C. Cir. 1988) (EPA II) (citations omitted) (“NEPA does not, however, expand the range of final decisions an agency is authorized to make”); *South Coast Air Quality Management District v. FERC* 621 F.3d 1085 (9th Cir. 2010) (“... NEPA may not be used to broaden [the federal agency’s] congressionally limited role”).

- To improve certainty, the FWS should adopt a revised mitigation policy that provides project proponents with certainty early in the process regarding the suitability of compensatory mitigation lands.
- The FWS proposed policy of allowing the enhancement or restoration of public lands as a form of stakeholder agreed upon compensatory mitigation, including for projects with impacts that do not occur on public lands, should require the public land manager to commit to providing long-term protection and management of compensatory mitigation occurring on public lands. Further, the Service should require the public land manager to implement and fully fund alternative compensatory mitigation in the event that there is a change in law that allows incompatible uses to occur on mitigation lands.
- To address potential concerns that the advance mitigation approach is pre-decisional, the policy could provide that “Points of Tentative Agreement” and “Mitigation Credit Letters” may be revisited if information received during public comment indicates that there was a mistake such that the conservation opportunity is actually not suitable compensatory mitigation.
- A requirement for a net conservation benefit exceeds agency authority. As the FWS Habitat Conservation Planning Handbook notes, “[m]itigation programs should . . . be practicable and commensurate with the impacts they address.” We question how the Service can decide to apply this revised policy to the ESA program, given the constraints on authority under Sections 7 and 10 of the Endangered Species Act.
- The mitigation policy should adopt an approach similar to that taken in the Section 10 of the Handbook to identify exceptions to the requirement to mitigate in advance of impacts.
- The FWS should ensure that the policy preserves flexibility to apply the various approaches and mechanisms currently being used to accomplish compensatory mitigation.

Thank you for your time and consideration of NACO’s comments. NACO supports the comments provided by the Clark County Desert Conservation Program– Multiple Species Habitat Conservation Plan. All of Nevada’s counties are important stakeholders that will potentially be affected by this proposed change in policy. We look forward to a final policy that provides project proponents with increased certainty and that contains flexibility to leverage the benefits that can be obtained through regional compensatory mitigation approaches.

Respectfully,



Jeffrey Fontaine
Executive Director

JF/ts

Cc: file



The following links and/or pages are support for agenda item 11d

Hi, Dagny and Tori – this is about the best we can do right now as far as an overview of the noxious weed EIS. We're anticipating beginning scoping as soon as January 2018. We're drafting the cooperating agency letters right now. Sorry for the delay in sending this – couldn't get my computer to cooperate this morning.

The HTNF proposes to implement treatment and restoration actions using an integrated and adaptive management strategy to prevent, control, or eradicate non-native invasive plant infestations across the HTNF, and to promote or restore native vegetation and resilient, healthy vegetative communities. The strategy is designed to treat known infestations, and just as importantly, to treat new species and infestations as they are discovered across the landscape in the future. The strategy also allows for use of technology and methods that are not available today but may be developed and approved in the future.

This integrated and adaptive approach is derived from the Forest Service National Strategic Framework for Invasive Species Management (2013), Forest Service National Strategy and Implementation Plan for Invasive Species Management (2004), Strategy for Noxious and Nonnative Invasive Plant Management (USDA Forest Service 1998a), and the Forest Service Invasive Species Management Manual (FSM 2900), all of which direct National Forests to implement adaptive integrated invasive species management programs.

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