



Nevada Association of Counties
304 South Minnesota Street
Carson City, NV 89703
(775) 883-7863
www.nvnaco.org

September 22, 2020

Hilary Smith, Senior Advisor for Invasive Species,
U.S. Department of the Interior,
Office of Policy Analysis—Mailstop 3530,
ATTN: Invasive Species Comments,
1849 C Street NW, Washington DC, 20240.

RE: Nevada Association of Counties Comment on the Department of Interior’s Invasive Species Strategic Plan. DOI-2020-0007.

Dear Ms. Smith,

As the state association representing all 17 of Nevada’s counties, the Nevada Association of Counties (NACO) appreciates the opportunity to provide comment to the Department of Interior’s draft Invasive Species Strategic Plan. For many Nevada communities, resource-based industries that are tied to public lands are their lifeblood. Therefore, staying apprised of and involved in federal land management planning and conservation efforts is critical. Counties provide road maintenance, emergency response, law enforcement and other mandated services on public lands and to public lands users.

Invasive Species in Nevada:

Invasive species such as cheatgrass and medusahead are significant factors in the increased risk of rangeland fire in Nevada. Wildfires have a devastating impact on Nevada’s landscape and ecosystems, and in turn the species and uses that depend on them. Nevada’s counties bear immediate and long-lasting socioeconomic impacts from wildfires in the state. County resources are often the first response when wildfires break out. Aside from the obvious threat to health and safety, wildfires result in major negative economic impacts including the cost of first-line response, repairs to county infrastructure, and secondary impact to county economies from damage to resources. Because invasive vegetation thrives in fire disturbed ecosystems, invasive vegetation continues to propagate across Nevada as part a viscous cycle of fire, more invasives, more fire.

Cheatgrass and medusahead are not the only problematic invasive plants in Nevada. [Other noxious and invasive weeds, including those listed on the Nevada Noxious Weed List \(Nevada Administrative Code 555.010\), have been determined to also create detrimental effects to our environment and economy including impacts to recreation, real estate value, agriculture, and rangeland health. For example, Tamarisk, or “saltcedar”, for example](#) can populate the banks of even intermittent waterways in the state. Not only does tamarisk compete against native species



Nevada Association of Counties
304 South Minnesota Street
Carson City, NV 89703
(775) 883-7863
www.nvnaco.org

it also effects the flow and morphology of waterways throughout the state and costs millions of dollars in management.

For the above-stated reasons, NACO supports practical, science-based approaches to managing, preventing, and removing invasive species. NACO generally supports the five goals that DOI has outlined in this Strategic Plan, and the policies they represent, including, but not limited to, collaboration and coordination with local governments, efficient and expedited management, and science-centric management approaches.

Mission, Vision, Goals, Objectives and Strategies

Formatted: Font: Bold

DOI specifically asks for feedback on the question of “Are the mission, vision, goals, objectives and strategies clear as written, and if not, what clarifications should be made?” The goals/objectives/strategies are not entirely clear. What is confusing is that goals/objectives/strategies are often separated in the Plan but are often not representative of their definition (i.e., objectives are often actually goals). The management alternatives in the Plan must be built on common and clear definition and application of visions, goals and objectives and these probably should be re-worked to be clear and get all users and land managers on the same page.

There are many sources of information in the resource management field, including specifically from DOI agencies, that clearly define the differences between vision, goals, and objectives (see BLM Planning Handbook (H-1601-1) p. 12; Adaptive Management: The U.S. Department of the Interior Technical Guide, Writing Refuge Management Goals and Objectives: A Handbook. U.S. Fish and Wildlife Service; and the Nevada Rangeland Monitoring Handbook (2018)). The common thread of these references describes differentiating between visions, goals, outcomes and objectives and then setting of objectives that fit the mnemonic SMART—Specific, Measurable, Achievable, Realistic/Related/Relevant, and Time-fixed.

S – Specific – They describe what will be accomplished, focusing on limiting factors, and identifying the range of acceptable change from the present to the proposed condition.

M – Measurable – The change between present and proposed condition must be quantifiable and measurable.

A – Achievable – Are the objectives set achievable in the current setting? Consider environmental constraints, societal expectations, economic parameters, legal requirements, and technological limitations.

R – Realistic/Related/Relevant – Set objectives that can be realistically achieved given the natural and management context of the situation. They are related in all instances to the land use plan goals and relevant to current management practices. Thus, they must be worthy of the cost of the management needed to achieve them and the monitoring needed to track them.



Nevada Association of Counties
304 South Minnesota Street
Carson City, NV 89703
(775) 883-7863
www.nvnaco.org

T – Time-fixed – They must be trackable over time and must include a specific and definite timeframe and location for achievement, monitoring, and evaluation.

What are often listed as objectives in the plan do not meet the SMART criteria and are really the outcomes, or goals, that objectives are meant to meet.

Goals Objectives and Strategies

a. Cooperation and Coordination

We are pleased to see that “Goal 1” appropriately emphasizes collaboration and coordination between multiple stakeholders in recognition that invasive species do not respect jurisdictional boundaries. We particularly appreciate that DOI has recognized their responsibility in the management process and is pledging to “do [their] share”. The proposal to use “memorandums of understanding, cooperative agreements, and other instruments” between the parties involved in planning and collaboration of invasive species management should prove helpful. Such agreements will ensure that DOI’s agencies fulfill their mandates. For instance, under FLPMA, the BLM must coordinate its land use inventory, and management activities with “States and local governments within which the lands are located.” This coordination requirement reflects that FLPMA recognizes that counties are critical partners and stakeholders in land management decisions. Integrated land management efforts which include close cooperative relationships with local communities are key to successful land management planning. We wish to see more focus on these partnerships at the local, county level. Many counties in Nevada have organized weed control districts established under State law and every county in Nevada has an appointed representative on their respective Conservation District (CD). Nearly every CD has noxious and invasive weed control as one of their primary management priorities. By focusing on agreements and funding with counties and their special and associated districts, DOI will be leveraging its investment and getting the best return on that investment. We also ask DOI to seek local businesses in implementing any work or treatments completed on DOI-managed lands.

We also strongly advocate for partnerships with Land Grant Universities on expanding the research, outreach, and education required to make the Strategic Plan successful. These universities and their already established research, education, and extension networks related to invasive species have been proven successful in assisting landowners and land managers address the issues DOI outlines in the Plan.

b. Efficient and Expedited Management

NACO would appreciate clarification on the way this Strategic Plan reconciles with other interior agency management tools and the National Environmental Policy Act. In general, NACO supports land management practices that are expedient and adaptable. For example, NACO has been generally supportive of BLM’s recent suite of tools geared at expedient and



Nevada Association of Counties
304 South Minnesota Street
Carson City, NV 89703
(775) 883-7863
www.nvnaco.org

efficient management of rangelands in the Great Basin, including the proposed CX for Pinion Juniper removal, [the BLM Fuel Breaks Programmatic EIS](#), and BLM's [Fuels and Rangeland Restoration Programmatic EIS](#), because we feel these will allow for beneficial management of rangeland ecosystems and reduce fuel for wildfire without requiring lengthy site-specific NEPA analysis.

It might be beneficial under Goal 4, Objective 4.4, to propose that Interior agencies make efforts to tailor proposed activities for managing invasive species. Perhaps the following language under *Objective 4.4. Increase efficiency of conducting environmental compliance for control activities* would be helpful: "e. ~~Encourage-Direct~~ agencies to use existing National Environmental Policy Act exemptions, regulatory exceptions, such as categorical exclusions, or tailor proposed actions to align with existing programmatic management tools." Invasive species management is an urgent matter, and it is vital that the speed and efficacy of the treatment is in proportion to speed and impact of their spread. Objective 3.2, does address the streamlining of regulatory process, but only limits this to rapid response actions when early detection occurs. It may be beneficial to add language regarding "streamlining" to the section "Crosscutting Principles" as well, so that it applies to all Goals and Objectives of the Strategic Plan.

It is important that Interior agencies consult with county governments to ensure that actions not requiring site-specific NEPA analysis are consistent with local land use plans and local weed control programs to balance the need for expedient treatment with local knowledge and local priorities.

c. Science-based Management

NACO appreciates DOI's goal to cost-effectively manage invasive species. However, that same goal should not necessarily include restoring native species. The spread of noxious and invasive plants in the Great Basin is connected to the prevalence of rangeland fires. Where ecosystems have suffered fire-caused disturbance, invasive fuel-laden species such as cheatgrass, propagate and the rate of encroachment of annual invasive grasses and the ever-increasing probability of wildfire is simply too serious of a problem to insist on management options that are unlikely to produce ideal outcomes. Native species are expensive, often difficult to obtain, and do not always compete well with non-desirable invasive species, particularly in marginal areas. Strict insistence on the use of natives can limit the size and effectiveness of rangeland restoration. Desirable non-native, [long-life, perennial](#) species (e.g., [crested wheatgrass](#), [Siberian wheatgrass](#), and [forage kochia](#)) that are more readily available, more cost effective and more competitive with non-native annual grass species and provide similar ecological functionality should also be encouraged for use. Use of [proven, beneficial](#) non-native non-invasive species would be a more cost-effective way to reconcile Goal 4 with Strategy 4.1.c: "Restore impacted species and habitats to enhance their resilience to disturbance and resistance to future invasive infestation" as well as Objective 4.2. [There are volumes of scientific research supporting this approach. For example, see the work by the USDA-ARS Great Basin Rangelands Research Unit regarding](#)



Nevada Association of Counties
304 South Minnesota Street
Carson City, NV 89703
(775) 883-7863
www.nvnaco.org

[combating cheatgrass and other invasive species at https://www.ars.usda.gov/pacific-west-area/reno-nv/great-basin-rangelands-research/.](https://www.ars.usda.gov/pacific-west-area/reno-nv/great-basin-rangelands-research/)

NACO supports Interior’s effort to “demonstrate accountability” for their agencies under their Crosscutting Principles. NACO would suggest modifying the language to the following: “Develop specific, measurable, achievable, results-oriented, and time-fixed (SMART) performance metrics to evaluate invasive species management activities. ~~Require~~ ~~Aim for~~ substantive annual net reduction of invasive species populations or infested acreage on Inter-manged lands and waters. ~~Require Report~~ annual reporting on performance results and share with Federal and non-federal partners.”

NACO also appreciates and strongly supports the recognition of outcome-based livestock grazing as an effective tool for reducing fuel loads and managing invasive plants under Objective 4.2.

Conclusion

We would like to thank the Department of Interior’s their consideration of the input and recommendations of Nevada’s counties. Any changes to public land management in Nevada effects our residents, county functions, and the ability for counties to serve their citizens’ basic needs. We look forward to continued engagement on this matter. If you have any questions, please do not hesitate to contact me at dstapleton@nvnaco.org, or by phone at (775) 883-7863.

Respectfully,

Dagny Stapleton
Executive Director