From:	Fritscher, Justin - NRCS, Washington, DC
To:	Angela_burgess@fws.gov
Cc:	Sadeghzadeh, Kaveh - NRCS, Washington, DC
Subject:	CCAA/SGI Comparison Document
Date:	Thursday, March 26, 2015 3:13:30 PM
Attachments:	image002.png image006.png 2015_3_23_CCAA SGI TAble GH TG comments.docx

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Hi Angela

Attached is the CCAA/SGI comparison document with our feedback/edits. Let us know if you need anything else from us!
Thank you!
justin

Justin Fritscher
Media Relations Specialist
USDA Natural Resources Conservation Service
d: (202) 720-5776
c: (202) 375-0871

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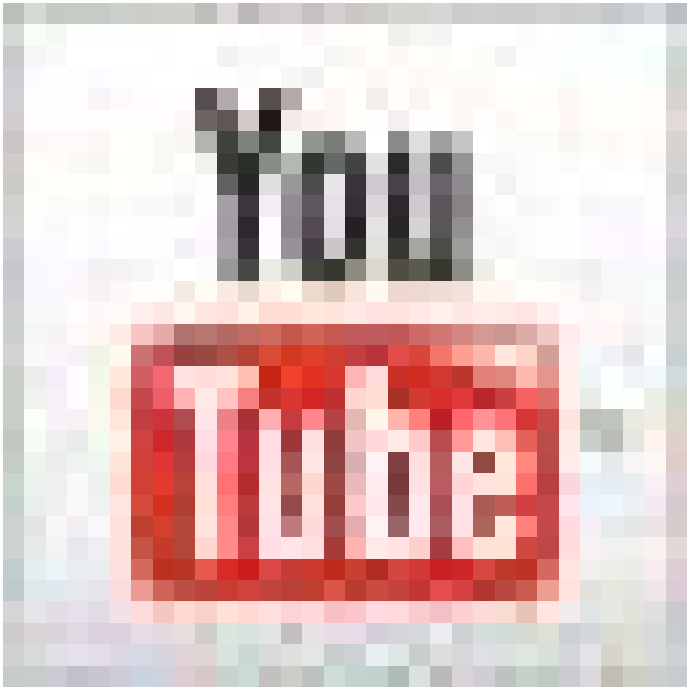
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CCAAs and SGI

	Candidate Conservation Agreement with Assurances (CCAA)	NRCS Sage-grouse Initiative (SGI)
Purpose of the Tool	Facilitate the conservation of proposed and candidate species and species likely to become candidates. Potentially preclude or remove the need to list species under the Endangered Species Act (ESA).	Conserve species by removing enough threats to species to preclude the need to list.
Participants	Any non-federal entities (public and/or private).	Any non-federal entities (public and/or private).
Species Covered	Proposed, candidate, or species likely to become candidates.	Sage-grouse only.
Activities Covered	Potentially any and all management activities occurring on a property, if permit issuance criteria are met.	Routine agricultural, ranching, and silvicultural operations and actions that provide benefits for both working landscapes and wildlife.
Regulatory Standard	The benefits of the conservation measures, combined with the benefits if similar conservation measures were to be implemented on other necessary properties, would preclude or remove the need to list the species covered by the CCAA.	No regulatory standard. However, an ESA section 7 conference report on the SGI conditioned the conservation practices to avoid and minimize expected incidental take to the extent feasible.
Regulatory Certainty for Enrolled Landowners	Assurances that additional measures and restrictions, beyond those agreed to in the CCAA, would not be imposed on the landowner, even if the covered species becomes listed. An Enhancement of Survival Permit authorizes the landowner to incidentally take the covered species should it be listed.	Already enrolled landowners would have predictability and would not be subjected to additional measures and restrictions, as long as they are properly implementing their conservation practices. In the unlikely event that changes to practices become necessary, they would be required only of future enrollees. If the species becomes listed, incidental take that may result from the conservation practices would be authorized through section 7.
Financial Assistance	None. However, funding for implementation may be available from other FWS programs or Federal and State agencies.	Financial assistance for plan implementation may be available to qualifying landowners but is not required for incidental take coverage. ESA Predictability is tied to the conservation practices ~~identified in the conservation plan~~ implemented rather than to the financial assistance provided.
Benefits for Landowners	Regulatory certainty through assurances and incidental take coverage. Conservation measures that benefit sage-grouse often also improve grazing conditions.	~~Regulatory~~ ESA predictability. Technical and financial assistance. NRCS conservation practices improve working lands for ranching operations. Any gathered personal information is fully protected by the privacy provision in the Farm Bill. Aggregated data may be shared with the USFWS, but only in a manner that maintains individual privacy.

Note: Implementation of CCAAs and SGI may vary depending on location.
For specific information, please contact your local NRCS and/or FWS office.

Comment [AB1]: Some of our staff suggested that we could add a paragraph before the table with very general information about FWS and NRCS working together towards private land conservation (through SGI and CCAAs) in case this got separated from the WLFW FAQ that we intended to provide with this material. Thoughts?

Comment [AB2]: Also received suggestions to potentially re-order the table to put what's of most interest to landowners at the top (potentially "benefits for landowners"?). Wanted to discuss with you before any additional changes are made.

Comment [GT-NBM3]: I agree this worksheet should always accompany the WLFW FAQ and to ensure that we can simply make this a pdf and join with the WLFW FAQ so it is one document. Would much rather do that than create separate narrative here describing same partnership. I have no problems with reordering as suggested by FWS.

Comment [AB4]: Because the heading of this row is "Purpose of the Tool," we tentatively removed mentions of assurances and financial assistance in this row because those are described in below rows.

Comment [AB5]: This previously stated "Assurances to signatories" – however, because we've consistently referred to CCAA assurances and SGI predictability, this has been changed to the more general term - "certainty"

Comment [AB6]: Request for clarification of meaning for landowner. Is it to clarify that financial assistance alone does not guarantee regulatory predictability?

Comment [AB7]: Request for clarification on concerns addressed here. Is the intent to inform landowners that the information associated with SGI is handled the same way as the Farm Bill? Or is it to inform landowners that the FWS would not have access to their individual information? Should this instead be a separate row related to landowner information?

Comment [HG-NWD8]: We are just reinforcing the privacy provisions and reminding the landowners that they are still protected through this partnership.

CCAAs and SGI

Regulatory Certainty with NRCS's SGI and FWS's CCAAs

3/23/2015

There is essentially no difference in the level of regulatory certainty for enrolled landowners under the Sage-Grouse Initiative (SGI) and greater sage-grouse Candidate Conservation Agreements with Assurances (CCAAs) for grazing. Under section 7 of the Endangered Species Act, the Natural Resources Conservation Service and the U.S. Fish and Wildlife Service conducted in-depth analysis of the effects of SGI's conservation practices on the greater sage-grouse, agreed on conditions to avoid and minimize impacts, and concluded that the program would be beneficial to the sage-grouse without additional measures. This approach provides landowners enrolled in SGI with predictability that the practices they agree to implement would not be modified and additional measures would not be added without their consent. Should new circumstances require changes to conservation practices, those modified practices would apply only to those landowners who enroll in SGI after the changes are made. For CCAAs, the Service provides assurances to enrolled landowners that they will not require any additional measures or restrictions, as long as the CCAA is being properly implemented. Therefore, should the greater sage-grouse become listed, landowners enrolled in SGI, a CCAA, or both, will be able to continue their land management practices as described in their respective plan with no additional measures or restrictions.

Note: Implementation of CCAAs and SGI may vary depending on location.
For specific information, please contact your local NRCS and/or FWS office.

Comment [AB9]: This language was edited in an attempt to very concisely provide the information that landowners need to know. We hope the message of the previous language is still intact (as that was our intent).