



DEPARTMENT OF THE NAVY  
OFFICE OF THE ASSISTANT SECRETARY  
(ENERGY, INSTALLATIONS AND ENVIRONMENT)  
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WASHINGTON DC 20350-1000

April 21, 2016

**Department of the Navy (DON) Position Paper**

**Subject: Greater Sage Grouse - Congressional Inquiry/Follow-Up**

1. On March 23, 2016, the House Armed Services Committee requested that Office of the Secretary of Defense (OSD) and the Services respond to four questions (RFI's) regarding the greater sage grouse. OSD provided responses to the four questions on April 5, 2016 and DON fully concurs with those responses. Below are DON-specific responses to the four RFI's.

- a. How would the Bureau of Land Management (BLM) or U.S. Forest Service (USFS) Resource Management Plans, and other requirements for protection of the greater sage-grouse (GSG) and its habitat, affect military training, operations, or readiness?

Answer: If the GSG were to be listed, the DON expectation is that BLM/USFS management plans would provide sufficient protection to prevent Critical Habitat (CH) designations on affected lands. The DON does not believe management activities under these plans will affect DON training, operations or readiness.

- b. If the GSG were to be listed as threatened or endangered under the Endangered Species Act (ESA), what affect would that decision have on military training, operations, or readiness?

Answer: Two DON installations are within the current range of the GSG where the birds and their habitats are present: Naval Air Station Fallon, NV and Marine Corps Mountain Warfare Training Center, CA. The DON does not believe that listing of the GSG would impact military training, operations, or readiness. However, if listed, installation Integrated Natural Resources Management Plans (INRMPs) would be reviewed and adjusted, if necessary, to ensure the designation of CH is not required. If adjustments are necessary, some additional costs could be incurred to implement any new INRMP requirement. DON would expect the U.S. Fish and Wildlife Service (USFWS), as it has in the past, to take into account GSG conservation efforts we have voluntarily undertaken and included in our INRMPs, and not require additional mitigation actions unless absolutely necessary. In addition, based on our INRMPs, we would expect our installations to be exempt from the designation of CH.

- c. How do INRMPs allow for both training and wildlife conservation at U.S. military installations while not adversely affecting military training, operations, or readiness?

Answer: The purpose of an INRMP is to ensure natural resources, such as the GSG, are managed in ways that also support the military mission. Per the OPNAV M-5090.1 (10 Jan 2014), natural resources managers must ensure INRMPs are prepared and

implemented using the ecosystem management approach, and in a manner consistent with the military mission to preclude designation of CH under the ESA. Our INRMPs facilitate the maintenance of a healthy ecosystem that supports a realistic landscape for military training, while minimizing adverse effects from military readiness activities.

- d. What statutory authorities does the Department of Defense (DoD) have to address potential conflicts that may arise in the future to ensure that military training, operations, and readiness will not be adversely affected? Does the Department believe these authorities are sufficient to protect the interests of the DoD without additional legislation from Congress?

Answer: Yes, the DON believes that current statutory authorities under sections 4 and 7 of the ESA are sufficient to protect the interests of the Department. If the GSG is listed, any DON action that may affect the greater sage grouse will require consultation with the USFWS pursuant to section 7 of the ESA. As is the case with regard to every section 7 consultation we enter into with the USFWS or NMFS, we seek to strike an appropriate balance between our ESA responsibilities and our military readiness obligations.

My point of contact on this matter is Mr. Dan Cecchini at (703) 614-1173.

Sincerely,



Karnig Ohannessian  
Deputy Assistant Secretary  
of the Navy (Environment)