CALFED Bay-Delta 2002 ERP Directed Actions
Selection Panel Review

Proposal Number: 230DA
Applicant Organization: US Fish and Wildlife Service
Proposal Title: Recovery Implementation for Riparian Brush Rabbit and Riparian Woodrat on the Lower Stanislaus River
Recommendation: Fund As Is

Amount: $6,427,131

Conditions, if any, of approval (if there are no conditions, please put "None"): None

Provide a brief explanation of your rating: The Selection Panel recognizes the riparian brush rabbit as the most imperiled vertebrate species in the CALFED planning area. Habitat acquisition, restoration, and long-term management in an effort to provide the species with more and more heterogeneous living space will be essential to its survival. The panel agrees with technical reviewers that the proposal still suffers from weakly articulated null hypotheses that can be tested in the field and does not clearly include a clear adaptive management framework for data collection, which can then be used to inform next management actions. These shortcomings are at least in part due to constraints imposed by the limited number of remaining brush rabbits and the small area occupied, which conspire to make field experimentation, especially replication and control extremely difficult.

Nonetheless it appears that the best available information on this and related species now has been brought to bear in this ongoing effort. The authorities on this species have been consulted or are directly engaged in the work plan. As noted in one of the reviews, the multi-front approach to informing and implementing the effort, including habitat acquisition, restoration, genetic analysis, and captive breeding is laudable.

The apparent success of captive breeding efforts enhances future opportunities for experimental release manipulations, both in spatial and temporal contexts, and allows for telemetry as desired. It is important that data on the ecological and genetic fates of released animals become incorporated into planning as soon as that information becomes available. The Selection Panel expects that the research and management team will take advantage of the proposed acquisition and manipulation of habitat to answer key questions regarding habitat use, especially use of restored habitats and upland habitat refugia where provided.

Purchasing some land as part of the project is essential to providing adequate areas for the reestablishment of wild brush rabbit populations and for the release of captive-bred brush rabbits. These lands will be purchased only from willing sellers, the applicant pledges. Their use for conservation and open space protection is consistent with the applicable county general plans, and has been coordinated with the counties during refuge and park planning processes. The amount of farmland to be affected has been

minimized by the applicants. Wildlife friendly farming practices that enhance habitats for the brush rabbits and other wildlife, while still continuing some farm uses of the site, will be considered as the project moves ahead. Unavoidable impacts, if any, to agriculture will be evaluated in the project's environmental documents, for which adequate provisions have been made in the proposal.

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Research and Restoration External Review Form
CALFED Ecosystem Restoration Program 2002 Proposal Solicitation Package

Proposal Title: Recovery Implementation for Riparian Brush Rabbit and Riparian Woodrat on the Lower Stanislaus River

Review:

1. **Goals.** Are the goals, objectives and hypotheses clearly stated and internally consistent? Is the concept timely and important?

The goals and objectives of acquiring land, restoring habitat, releasing captive bred animals, and monitoring are reiterated clearly in this resubmission. While most of the reviewers points were addressed I could not find new adjustments. I can understand the response of the submitters that this proposal is not meant to be a replicated, hypothesis testing experimental design but a rescue effort that will yield information about the response of an endangered species to habitat enhancements . I personally agree with them that valuable information can come out of this project and that it is timely in this day of habitat fragmentation and loss of biodiversity.

2. **Justification.** Is the study justified relative to existing knowledge? Is a conceptual model clearly stated in the proposal and does it explain the underlying basis for the proposed work? Is the selection of research, pilot or demonstration project, or a full-scale implementation project justified?

If the biology of the brush rabbit is fairly well studied (as the authors say), then this project should enhance that knowledge base. I did not perceive a well described model such as source-sink, metapopulation exchange, or so forth in this proposal. It may have been strongly alluded to or described elsewhere but I did not pick up on it. I certainly believe that it is justified to acquire land, restore habitat, and monitor the population response of an endangered species to habitat enhancements.

3. **Approach.** Is the approach well designed and appropriate for meeting the objectives of the project? Are results likely to add to the base of knowledge? Is the project likely to generate novel information, methodology or approaches? Will the information ultimately be useful to decision-makers?

I like the multidimensional characteristics of the proposal (habitat restoration, refugia placement, genetic analysis, captive breeding, and so forth). Information from studies like this have proved valuable in the past and I expect this one will also. Novel information may come from the refugia, captive breeding, and genetic studies. I did not notice any reference to the use of radiotelemetry in this resubmission. I strongly urge its use to document movement patterns of released animals. Decision-makers should find the success of the refugia and captive breeding aspects especially valuable.

4. **Feasibility.** Is the approach fully documented and technically feasible? What is the likelihood of success? Is the scale of the project consistent with the objectives?

The positive support from associated agencies in the public comments leads me believe that this project is feasible and has a high probability of success. Even if the rabbits do not survive, the preservation and expansion of the riparian ecosystem is a valuable accomplishment. The scale (hundreds of acres) appears to be appropriate. The degree of habitat connectivity that can be achieved still remains unclear to me however.

5. **Project-Specific Performance Measures.** Does the project include appropriate performance measures to measure success relative to the project's goals and objectives? Is there enough

detail as to how the performance measures will be quantified? For restoration projects, are monitoring plans explicit and detailed enough to determine if performance measures will be adequately assessed?

As mentioned earlier, I view radiotelemetry and data on animal movements (home range, habitat selection, refugia use, individual dispersal, and so forth) as vital. I did not notice much on statistical analysis and other performance measurers. I also am unsure about the adequacy of assessment techniques regarding habitat restoration success or failure.

6. **Products.** Are products of value likely from the project? Specifically for restoration projects, are products of value also likely from the monitoring component? Are interpretative outcomes likely from the project?

Do the rabbits survive? Does the captive breeding program work? Do refugia work to allow populations to persist? Do rabbits do better in the restored areas? Answers to these questions should be valuable products. Again, I am unsure about the adequacy of the assessments techniques.

7. **Capabilities.** What is the track record of applicants in terms of past projects? Is the project team qualified to efficiently and effectively implement the proposed project? Do they have available the infrastructure and other aspects of support necessary to accomplish the project?

I have no reason to assume that the personnel in these agencies would be unable to perform this project. They appear to be experienced professionals with adequate access to resources.

8. **Cost/Benefit Comments.** Is the budget reasonable and adequate for the work proposed?

To me, the priorities are that the land be acquired, that habitat enhancements be made, and that the success of the measures be assessed. Perhaps this can be done for less money or the project can be funded in stages.

Miscellaneous comments: I still like this proposal. I agree that its value is not in its experimental design but in the advantage it takes of a situation involving an endangered species declining due to habitat loss and degradation. It would be a shame to not at least acquire some land and see if the populations respond.

Please provide an overall evaluation summary rating: Excellent: outstanding in all respects; Good: quality but some deficiencies; Poor: serious deficiencies.

Overall Evaluation Summary Rating	Provide a brief explanation of your summary rating
- Excellent	
- Good	X—This appears to be a classic example of habitat loss and a declining species that needs action and study.
- Poor	

Research and Restoration External Review Form
CALFED Ecosystem Restoration Program 2002 Proposal Solicitation Package

Proposal Title: Recovery implementation for the riparian brush rabbit and riparian woodrat on the Lower Stanislaus River

Review:

1. **Goals.** Are the goals, objectives and hypotheses clearly stated and internally consistent? Is the concept timely and important?

The goal of this project, as I understand it, is the development of 3 or more self-sustaining populations of riparian brush rabbits. The project is timely and important, given the dramatic decline in the populations of this subspecies due to habitat degradation and loss. There are no clear hypotheses that are being tested through rigorous experimentation, in part because the investigators believe that they cannot justify such research with limited funding, limited habitat, limited numbers of rabbits and limited time. They have chosen to develop a "Best Practices" approach to the recovery problem, given current knowledge.

2. **Justification.** Is the study justified relative to existing knowledge? Is a conceptual model clearly stated in the proposal and does it explain the underlying basis for the proposed work? Is the selection of research, pilot or demonstration project, or a full-scale implementation project justified?

I consider that the captive propagation and reintroduction is justified, based on existing knowledge, and the applicants' proposal. In my view, the approach that the applicants propose, i.e. captive breeding, reintroduction, and habitat augmentation and restoration are appropriate to the problem. However, I don't feel that there is a conceptual model clearly stated that derives from the current literature and knowledge of species recovery through captive propagation and reintroduction or translocation. The authors of this proposal do not put their proposal in the context of other captive propagation and reintroduction programs or suggest potential alternative approaches that they might consider, depending upon the early results from their efforts. They do not provide something akin to a decision tree such that, depending upon initial results they might change their approach in order to test different hypotheses. In that respect, they do not demonstrate that they are using "adaptive management" principles.

There is a reasonable literature on captive propagation and reintroduction, which except for genetic and demographic considerations, they do not seem to have used in the development of their proposal. Both the IUCN and the AZA have Guidelines for Reintroduction Programs which the investigators should at least acknowledge. Additionally, within and outside the US, there have been many reintroduction programs in which adaptive management has been documented (ie the methodology has changed due to scientific results, including black-footed ferrets, swift foxes, California condors, and golden lion tamarins). An experimental approach has been taken with species whose numbers were as low as the brush rabbits.

There are questions that the investigators could pose and thus they could do some hypothesis testing, even within their current plan, by altering activities over several years. Some null hypotheses that could be addressed over a 3 –year period include: 1) There is no difference in survival of rabbits reintroduced in different seasons; 2) There is no difference in survival of rabbits reintroduced at the age of dispersal vs. older ages; 3) There is no difference in survival of male vs. female rabbits; 4) There is no difference in survival of rabbits reintroduced in groups of 5, 10, or 20; 5) There is no difference in initial survival and population growth of rabbits reintroduced into habitats with or without predators; 6) There is no difference in survival and population growth of rabbits reintroduced with vs. without pre-release habituation to the release site; 7) There is no difference in survival and population growth of rabbits reintroduced with or without nesting structures; or 8) with or without supplemental food for the first 6 months ("soft" vs. "hard" release). The above examples are not rocket science and simply require that the investigators are prepared to test some hypotheses experimentally over the course of a 3-5 year period. Once a captive population is secure, they could also do some more experimentation with environmental variables, i.e. vary the kinds of

restoration and compare survival and they could compare survival of captive-bred rabbits with wild-born rabbits after translocation.

They mention possibly doing some experiments on habituating captive-born rabbits to predators, but do not elaborate on objectives, potential techniques and predicted outcome.

3. **Approach.** Is the approach well designed and appropriate for meeting the objectives of the project? Are results likely to add to the base of knowledge? Is the project likely to generate novel information, methodology or approaches? Will the information ultimately be useful to decision-makers?

Given current knowledge of riparian brush rabbit behavior and ecology, and the stated urgency of the need to develop additional populations of this subspecies, the approach proposed is appropriate for meeting the project's objectives. Good scientifically defensible results will be obtained through a correlation of mortality, dispersal, activity rhythms, and home range size with age, sex, season, habitat features, etc. However, correlation is not the same as cause, and ultimately the investigators will not be able to explain the reasons for their success or failure. The project will generate novel information about brush rabbit ecology, behavior and reproduction, but not novel approaches to recovery since the investigators are not testing hypotheses concerning different routes to recovery (see above). While the information will be useful to decision-makers, e.g. the types of habitat that are and are not correlated with brush rabbit recovery, it will not provide an estimate of the most cost-efficient approach to recovery because it is not examining alternative approaches to recovery, either through varying the conditions or kinds of captive rabbits being released, varying the habitats into which they are released (differential restoration) or even comparing survival of captive-born vs. wild-born translocations (once there is a secure captive population).

4. **Feasibility.** Is the approach fully documented and technically feasible? What is the likelihood of success? Is the scale of the project consistent with the objectives?

I cannot comment on issues having to do with land acquisition. However, the captive breeding and release approaches are well-documented and feasible, in my view as are the monitoring procedures which are well-documented in the revision. I am unable to gauge the likelihood of success (i.e. achieving the proposed recovery objectives). The scale of the project (not considering land acquisition which I cannot judge) is consistent with its objectives. Species recovery programs are not cheap.

5. **Project-Specific Performance Measures.** Does the project include appropriate performance measures to measure success relative to the project's goals and objectives? Is there enough detail as to how the performance measures will be quantified? For restoration projects, are monitoring plans explicit and detailed enough to determine if performance measures will be adequately assessed?

Since the project's goals and objectives are not quantified, quantitative methods to measure success are not available for different time frames. Given that the investigators do know something about rabbit reproduction and home range size in decent habitat, they could develop clearer quantitative goals or estimates for the amount of restored habitat and the number of rabbits and rabbit populations for each year. They could also be clearer about their expectations for annual productivity in the captive rabbit population. These annual goals are likely to change depending upon initial results, which is fine, but the applicants do need to define more clearly their annual goals.

The investigators now provide detailed information about their monitoring plans both for the captive and free-ranging populations. The correlations they plan to do and any additional hypotheses can be tested with the current monitoring plan or slight adjustments.

6. **Products.** Are products of value likely from the project? Specifically for restoration projects, are products of value also likely from the monitoring component? Are interpretative outcomes likely from the project?

If the investigators can achieve their goal of developing 3 or more self-sustaining populations of brush rabbits over a 5 year period, they will have certainly achieved a product of value. The monitoring will

provide considerable new data on brush rabbit ecology, behavior and reproduction, and the investigators will have developed a "recipe" for the restoration of this subspecies. They may or may not, however, contribute to the science of species reintroduction and recovery in a general sense. Since their scientific results will mainly derive from correlations among a suite of variables, there will be limited ability to interpret the basis for the outcome. The inclusion of some specific hypotheses to be tested would enhance the value of the results.

7. **Capabilities.** What is the track record of applicants in terms of past projects? Is the project team qualified to efficiently and effectively implement the proposed project? Do they have available the infrastructure and other aspects of support necessary to accomplish the project?

The applicants are certainly qualified to implement the proposed project. They have been studying brush rabbits for years and the monitoring technology they will use is totally appropriate. They indicate that they are bringing in consultants in areas where their expertise is more limited. I encourage them to seek more help with the captive propagation, rabbit preparation and release program from individuals with greater experience in these areas.

8. **Cost/Benefit Comments.** Is the budget reasonable and adequate for the work proposed?

I think that the investigators should have as part of their plan a way to develop the most cost-effective method of monitoring survival and dispersal. The monitoring program they propose is extremely intensive, but eventually they will need a simpler approach to keep track of new releases and population sizes in the different release sites. They will need a simple method for annual censuses; probably annual trapping will do it.

Miscellaneous comments:

I think that this is a timely and necessary, but ambitious proposal. Its ultimate importance and relevance will derive not only from the recovery of the brush rabbit and its riparian ecosystem, but from the contributions to the science of recovery that the applicants can make.

Please provide an overall evaluation summary rating: Excellent: outstanding in all respects; Good: quality but some deficiencies; Poor: serious deficiencies.

Overall Evaluation Summary Rating	**Provide a brief explanation of your summary rating**
- Excellent	This is an important and ambitious proposal, but one that still needs more guidance in the area of hypothesis-testing and providing a scientific experimental basis for the project.
- Good XXXXXXXXX	
- Poor	

Research and Restoration External Review Form
CALFED Ecosystem Restoration Program 2002 Proposal Solicitation Package

Proposal Title: ***Recovery Implementation for Riparian Brush Rabbit and Riparian Woodrat on the Lower Stanislaus River***

Review:

1. **Goals.** Are the goals, objectives and hypotheses clearly stated and internally consistent? Is the concept timely and important?

   The proposal is designed to restore habitat for riparian brush rabbits and riparian woodrats. The objectives are focused heavily on 1) the recovery of these two riparian species and 2) the relationships between these two species and vegetation structure. The hypotheses are limited. The PIs acknowledged that limitation and largely decided to avoid hypothesis testing.

   My major concern with this proposal is that it has a relatively narrow focus on vegetation influence on riparian brush rabbits and riparian wood rats. If CALFED finds it desirable to fund endangered species recovery within the Delta and Sacramento-San Joaquin River systems, this proposal is based on an active program of captive rabbit breeding and release and vegetation management to support rabbit and woodrat populations. But I remain disappointed in the proposal because it 1) largely ignores floods and floodplain processes and 2) relies on horticultural approaches rather than natural processes for vegetation restoration. Except for the affinity of these two species for riparian areas, this project could occur anywhere. The investigators may be successful because of their knowledge of the mammals and riparian vegetation. But the proposal largely does not recognize the role of floodplain processes and natural processes of restoration. This means that CALFED will not learn as much about natural processes of restoration from this effort and is likely to see additional proposals that do not capitalize on natural processes of restoration (see comments on Approach below).

2. **Justification.** Is the study justified relative to existing knowledge? Is a conceptual model clearly stated in the proposal and does it explain the underlying basis for the proposed work? Is the selection of research, pilot or demonstration project, or a full-scale implementation project justified?

   The project is justified in terms of recovery of two listed species and active establishment of native vegetation.

3. **Approach.** Is the approach well designed and appropriate for meeting the objectives of the project? Are results likely to add to the base of knowledge? Is the project likely to generate novel information, methodology or approaches? Will the information ultimately be useful to decision-makers?

   The proposal does not incorporate floodplain structure and processes into its experimental design or measurement systems. It largely acknowledges the criticisms of earlier reviews and says that it will work with other agencies or individuals to encourage measurement of channel and floodplain features and flow characteristics. It states that it will ensure that these measurements will be made but it does not indicate 1) how its will ensure that measurement will be made, 2) how these measurements fit into their experimental design, and 3) how the geomorphic and hydrologic data will be used in the analysis of their animal monitoring and vegetation manipulation. I simply do not understand how such an expensive and extensive restoration project can treat floodplain processes as such a minor part of their effort.

4. **Feasibility.** Is the approach fully documented and technically feasible? What is the likelihood of success? Is the scale of the project consistent with the objectives?

There is a reasonable likelihood that the proposed restoration efforts would be successful, though they are likely to encourage active intervention because it is the favored approach of the investigators from the very initiation of the project. As stated above, passive restoration measures and natural floodplain processes will be viewed as secondary influences on the responses.

5. **Project-Specific Performance Measures.** Does the project include appropriate performance measures to measure success relative to the project's goals and objectives? Is there enough detail as to how the performance measures will be quantified? For restoration projects, are monitoring plans explicit and detailed enough to determine if performance measures will be adequately assessed?

   The measures of performance are directly related to the release of animals and subsequent population trends and performance of the vegetation manipulations.

6. **Products.** Are products of value likely from the project? Specifically for restoration projects, are products of value also likely from the monitoring component? Are interpretative outcomes likely from the project?

   The project will add additional information about riparian brush rabbits and riparian woodrats. The proposal is likely to contribute to the recovery of these two endangered species. The proposal is less likely to contribute to an integrated understanding of the dynamics of this floodplain river and its influence on floodplain forests and wildlife species.

7. **Capabilities.** What is the track record of applicants in terms of past projects? Is the project team qualified to efficiently and effectively implement the proposed project? Do they have available the infrastructure and other aspects of support necessary to accomplish the project?

   The investigators have extensive experience with the mammal species and riparian vegetation. The team does not include scientists with experience on floodplain geomorphology or hydrology.

8. **Cost/Benefit Comments.** Is the budget reasonable and adequate for the work proposed?

   The budget asks for $6.4 million for one year. This is a large budget but land acquisition in this area is extremely costly. The SJRNWR census and monitoring costs more than $350,000 per year but it is not clear what would be included in that monitoring. This is a large budget for monitoring.

Miscellaneous comments:

Please provide an overall evaluation summary rating: Excellent: outstanding in all respects; Good: quality but some deficiencies; Poor: serious deficiencies.

Overall Evaluation Summary Rating	**Provide a brief explanation of your summary rating**
- Excellent	The proposal is technically sound in terms of population dynamics of riparian mammals and riparian vegetation, but it does not INTEGRATE studies of floodplain processes. To me, this is a serious deficiency in view of the amount of funding resources requested.
- Good X	
- Poor	

Ecosystem Restoration Program –Directed Action: Land Acquisition

Proposal Title: *Recovery Implementation for Riparian Brush Rabbit and Riparian Woodrat on the Lower Stanislaus River*

1. Is the site's ecological importance documented in the proposal? Yes. If yes, please import relevant text and citations here

Our dual objectives are (1) taking immediate and critical action to prevent extinction of the brush rabbit by providing improvements in occupied habitat and a second, protected release-site; and (2) establishing a Preserve that meets larger ecosystem goals benefiting multiple at-risk species without precluding future floodplain restoration on a broad scale (page 6). [The] second release site needs to be ready as soon as possible because we anticipate a need in 2003/2004…. For implementation of brush rabbit recovery we need 500-1,000 contiguous acres with riparian communities and flood refugia, and a wildlife-friendly agricultural buffer. The amount of acreage needed for the buffer depends on the property's configuration, existing condition, proximity of the levee to the river channel, and regulatory constraints…. Our planning has included certain preserve-selection criteria. The lower Stanislaus River is being targeted because it meets these criteria …

We are targeting riparian habitat and adjacent agricultural lands on the south bank of the lower Stanislaus River (river mile 0-9.5) which meet reintroduction selection criteria and may be useful in improving riverine ecosystem functions. The target area for the Lower Stanislaus River (page 7) Riparian Preserve (Preserve) includes approximately 2,300 acres (one-third flowage easement, two-thirds agriculture) within, adjacent, or just upstream to the boundaries of the San Joaquin River NWR and across the river from Caswell Memorial State Park. Within this area we need to protect 500-1,000 acres of existing and restorable riparian habitat (page 8).

At Caswell Memorial State Park (2 brush rabbits trapped in 2001) tasks have been added to the grant request to further the protection, expansion, habitat enhancement, and monitoring at the Park. These tasks focus on protecting additional acreage … which will be specifically restored for the brush rabbit and provide space for flood refugia either utilizing the levee or building a mound(s) (page 9).

2. Is the owner's willingness to sell the site documented in the proposal? If no, please explain:

No, but the proposal does state "Our strategy will be to work with willing sellers or easement holders to create a Preserve that will be managed by the Refuge" and "Land or easements will be purchased only from willing landowners and offers made will be based on an approved appraisal and existing fair market value."

3. Is evidence of local government support for the purchase included in the proposal? If yes, please explain:

No, but the proposal states: “The Service also coordinated with Stanislaus County [during the Refuge expansion phase] and the County had an opportunity to determine the consistency with the general plan during that process” (page 16) and “[San Joaquin] County has stated in its October 9, 2002, letter that the acquisition of this land is consistent with the General Plan. (p. 17).

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4. Is the use proposed for the site after its purchase clearly consistent with the site's general plan designation and zoning? If no, please explain:

It seems to be. San Joaquin County has stated that the acquisition of this land is consistent with the General Plan. Stanislaus County has zoned the area proposed for the Lower Stanislaus River Riparian Preserve as a general agricultural district (A-2), which is intended to support and enhance agriculture as the predominant land use, and to protect open space lands. Natural resources management and enjoyment of scenic beauty are identified as being compatible with agricultural and open space land uses. (p. 17)

5. Is the land mapped as prime farmland, farmland of statewide significance, unique farmland, or farmland of local importance? Yes – apparently about 227 acres, approx. 50% Prime and 50% Unique. This could increase to 436 acres if levees are breached in future phases of the project.

   Is the site under a Williamson Act contract? A Williamson Act contract is in place on the property adjacent to Caswell.

   Will use of the site change from agriculture after its purchase?

   Approximately 50 acres at two sites may be taken out of agriculture to accommodate the needed riparian restoration and flood refugia.

6 Is this a time-sensitive acquisition opportunity, according to the proposal? If yes, please import relevant text here:

Yes, because of the high threat of this species’ extinction and the need to release sites for captive-reared animals.

Other Comments: The proposal’s page 8 lists a variety of measures intended to minimize and mitigate impacts to agriculture:

Compatible floodplain agricultural uses, such as cattle grazing or select crops, could continue in areas outside that needed for the riparian habitat. Seasonal or limited cattle

grazing in the riparian habitat may be compatible with maintaining optimum habitat for riparian brush rabbits and woodrats. Primary economic and agricultural production losses to the agricultural community will be minimized by utilizing, to the greatest extent possible, existing riparian communities, promoting conservation easements and continuing agricultural practices in the agricultural buffer, and by providing monetary and regulatory incentives to participating private landowners. Funding for Safe-Harbor Agreements has been secured through a new federal Section 6 grant proposal. If the lands come into the Refuge system, the counties will, under the Refuge Revenue Sharing Act, be reimbursed annually to offset revenue lost as a result of fee title acquisition. Secondary economic losses (e.g. feed, fertilizer, and tractor suppliers) may not be fully mitigated.

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CALFED Bay-Delta Directed Action
Administrative Review
Budget Evaluation

Proposal number: 230

Proposal title*:* *Recovery implementation for Riparian Brush Rabbit and Riparian Woodrat on the lower Stanislaus River*

Does the proposal include a detailed budget for each year of requested support? Yes

If no, please explain:

Does the proposal include a detailed budget for each task identified? Yes

If no, please explain:

Does the proposal clearly state the type of expenses encompassed in indirect rates or overhead costs? Yes

If no, please explain:

Are appropriate project management costs clearly identified? Yes

If no, please explain:

Do the total funds requested (Form I, Question 17A) equal the combined total annual costs in the budget summary? Yes

If no, please explain (for example, are costs tp be reimburse by cost share funds included in budget summary).

Does the budget justification adequately explain major expenses? Yes, when combined with proposal text on estimated acquisition costs.

If no, please explain:

Are there other budget issues that warrant consideration? Yes

If yes, please explain: Although the budget detail is very explicit to dollar amounts, the budget justification indicates that certain overhead rates and specific salary costs will be defined when contracts are negotiated. The proposal text indicates that should the Buffington property not be acquired successfully, the grant request will increase by ~$5 million (pg 33). It would appear that the applicant is less clear about what services can be provided for a specified cost than the annual budget tables would imply.

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