

III. ELEMENTS FOR ENHANCING THE 4 C's INITIATIVE

Shared community stewardship to enhance natural resource health is the overriding mission of the 4 C's Initiative and the primary framework and guidance for building community participation for the care and conservation of the public lands. BLM is well positioned to move its own efforts at partnership and collaboration into this next level of public involvement. BLM is committed to making public land management (1) collaborative, transparent and inclusive; (2) place-based and citizen- and community-driven; (3) participatory and landscape-based; and (4) targeted to environmental and land management performance and conservation outcomes that address the health and well-being of natural and human communities.

Shared community stewardship is the anticipated and desired end-point of citizen-based conservation of the public lands. Through its long tradition of collaborative partnerships BLM is poised to realize the potential of shared community stewardship by extending and enhancing already existing administrative options for public involvement in decision-making. The full range and capability of those options for enabling innovative and participatory governance of the public lands is yet to be discovered, but the known possibilities are many and are manifested by:

- Evolving processes for consensus- and community-based planning (La Cienegas National Conservation Area);
- An open-ended and dynamic future for the role and contributions of Resource Advisory Councils (RACs) and sub-groups;
- New and innovative institutional arrangements for shared management of discrete land areas (Sand Flats Recreation Area, Utah) as well as extensive landscapes (Eastern Nevada Landscape Restoration Project);
- Emergent opportunities for citizen participation in monitoring and assessment of public land management;
- A proliferating richness in and democratic application of the tools of Alternative Conflict Resolution; and
- Promises of participatory governance that are imbedded in the unfolding nature of adaptive, outcome-based management.

All of these developments, anchored in a meritorious past, are silently yet resolutely moving the bureau and the public toward a future of citizen-based conservation – a promised legacy whose defining characteristic is *shared community stewardship of public lands by the American people, with the American people and of the American people*. This is the 4 C's Initiative. It builds upon the bureau's past and present and it looks toward tomorrow for its guidance. It implements both the Secretary of the Interior's 4 C's agenda – *conservation through cooperation, communication and consultation* – and the new environmentalism, both of which highlight and rely upon *citizen participation in stewardship and individual and community volunteerism*.

The new environmentalism sets the broad conceptual framework for the 4 C's and the 4 C's

Initiative. Its principles include:

- ***Innovation.*** Many of our most intractable environmental problems resist solution for lack of creative ideas and new conservation arrangements. One goal of the 4 C's Initiative is to encourage, facilitate and foster innovation by focusing on management outcomes, not management prescriptions. Innovation refers both to new techniques (e.g., seasonal grazing in riparian areas, solar fencing, GIS-based planning models, GPS, web-based information systems and other technologies) and new institutional arrangements (e.g., Resource Advisory Councils, "grass banks," consensus-based planning, mitigation banks, conservation land trusts, conservation easements, citizen advisory councils, new cooperating agency status for local governments, citizen oversight groups, shared governance arrangements, contracts and other partnerships and agreements).
- ***Incentives.*** For years, the threat and application of punishment (fines, enforcement actions, etc.) have been the tools used by agencies to persuade people to practice conservation. But people are most likely to practice conservation when engaged as peers, and given positive reasons to participate. The challenge is to identify the policies and institutions that will best nurture incentives for conservation and stewardship by the people who use the public lands, whether for work or for recreation. The 4 C's Initiative is intended to help support and develop a nation of self-motivated citizen stewards by ensuring that federal policies and regulations are conducive to a wide range of shared stewardship opportunities.
- ***Place-Based Information and Knowledge.*** Place-based information and knowledge are integral to the practice and success of the 4 C's Initiative. People closest to a situation, whether measured in terms of physical proximity or a record of experience irrespective of residence, frequently know the best conservation and land management approaches because they often have the best "on-the-ground" information. This especially applies to place-based decision-making. Good environmental decisions must be tailored to circumstances. This requires decision-making that taps information of locality and that incorporates knowledge of time, place, and circumstance. The expert knowledge and science applied by land managers are an important part of this. So, too, is experiential knowledge – the knowledge of the individual rancher, farmer, recreationist, conservationist, resource specialist or other resource user who knows the landscape in which he or she works or plays. Each stream, each pasture, each valley and upland has its own tale, its own particular story – details that matter immensely when deciding among conservation options.
- ***Integrated Decision-Making.*** Integrated decision-making is instrumental to the 4 C's Initiative. In the past, many of our environmental institutions and policies partitioned decisions about air from decisions about water and waste, decisions about one species from another species, decisions about the management of uplands from wetlands, and decisions about the needs of public lands from the requirements of adjacent private, state, tribal or federal lands. Better conservation efforts require more holistic, integrated decisions in which we consider whole landscapes and in which we blend environmental, community, and economic goals. The challenge is to discern which institutions and decision-making settings will enable us to attain this blending of goals and values.

The new environmentalism departs from the framework of past environmental policy. As noted above, it rejects the notion of piecemeal solutions to otherwise holistic environmental problems and challenges the desirability and sustainability of solutions prescribed from the top down. It seeks solutions that are voluntarily embraced and implemented. More importantly, it puts process in proper perspective. For many years, the environmental success of many federal agencies has been measured more by what they have done procedurally – the issuance of permits and compliance with decision-making procedures – than by what they have done “on-the-ground” to advance conservation. The new environmentalism is performance and outcome-based. It measures environmental success by what is accomplished “on-the-ground” toward the attainment of public landscape goals: *the actual conservation of land, water, and wildlife*.

The new environmentalism embraces the Secretary’s 4 C’s agenda to foster innovation, create incentives for citizen stewardship, tap local information of both experts and local residents, provide integrated decision-making, and to make conservation outcomes, not administrative procedure and process, the touchstone of environmental achievement. In turn, the 4 C’s agenda and the 4 C’s Initiative are the Department’s and the BLM’s implementation vehicles for the new environmentalism on America’s vast federal estate. They reaffirm the obligation of all Americans to the land, redefine and reinvigorate the stewardship role of people who engage in the use of public lands, and measure our success and performance in creating and maintaining healthy landscapes. Each element of the 4 C’s contributes toward these several ends. Specifically:

- **Cooperation** signifies the Department’s and the BLM’s commitment to working in partnership with all citizens to manage, conserve and protect public lands for present and future generations. Cooperation rests on voluntary action and depends on the incentive-based tools that enable effective volunteerism.
- **Communication** signifies the Department’s and the BLM’s commitment to transparency and accountability in its management of natural resources. Communication highlights the ongoing dialogue for conservation innovation that occurs through the unencumbered exchange of ideas. Innovation, in turn, is the wellspring of the 4 C’s Initiative, the 4 C’s agenda and the new environmentalism.
- **Consultation** signifies the Department’s and the BLM’s commitment to seeking the views of all interested citizens and more fully engaging those citizens in the management of public lands. Consultation implies integrated decision-making and landscape-level action consistent with legal rights and contracts. Consultation affirms the Department’s and the BLM’s commitment to working with interested citizens to incorporate local information and knowledge in addressing place-based conservation and land management challenges.

The Secretary’s 4 C’s agenda and the new environmentalism set-forth the basic framework of the 4 C’s Initiative – its commitment to citizen stewardship. Consistent with this commitment, the 4 C’s Initiative is not experimental; it is not envisioned as a series of pilot projects designed to demonstrate, assess or evaluate the efficacy and desirability of shared stewardship on public lands. Rather, the 4 C’s Initiative will build upon the 4 C’s successes of the past, seeking new and more comprehensive venues and opportunities for the full expression of citizen stewardship on public lands. The initiative presupposes that shared stewardship of public lands by the people, with the people and of the people in partnership with the BLM is right in a nation dedicated to democratic principles. The issue addressed by this report is not whether the 4 C’s

work, but how the 4 C's concepts can be refined, expanded upon and systematically advanced and how, ultimately, the concepts can be inculcated into the culture and everyday business of the BLM. Projects are one vehicle by which to attain this institutionalization.

Fully integrating the 4 C's into every aspect of bureau culture and operations has distinct advantages for the BLM, participating communities and natural resources. They include:

- More efficient and effective use of agency resources by shortening the learning curve of field managers and better preparing them for engaging their constituencies creatively and positively in community stewardship;
- Increased bureau capacity to extend its current shared conservation activities to all Field Offices and expand 4 C's innovation and experimentation to expedite and attain the outcome of shared community stewardship;
- Expanded focus and application of 4 C's from single or traditional constituencies to broader communities of interest and place;
- Greater appreciation for the power of partnerships in leveraging scarce budget dollars and in meeting resource management goals and objectives: shared stewardship is not just an economic reality, it is also a social and political necessity;
- Adoption of a land management ethic and methodology that is most consistent with democratic values and public demands for stewardship participation;
- Orienting agency management and operations increasingly toward performance, outcome and participatory decision-making;
- Greater likelihood that 4 C's implementation will no longer depend on charismatic leaders within the agency;
- A shift from the agency being the exclusive "doer" to becoming the "facilitator" of management, and from being the "controller" of management to becoming a "partner" with citizens in management;
- Enabling the agency to respond appropriately and effectively to community demands for a new way of doing business on public lands;
- Creating capacity within local communities to join with BLM in shared stewardship of public lands; and
- Promoting within communities of place and interest a sustained sense and acceptance of responsibility for the long-term management of the lands and resources they use and upon which they depend for work, recreation and a healthy living.

In summary, the general purposes of the 4 C's Initiative are essentially two-fold: One, to identify the tools, institutions and guiding rules by which stewardship partnerships can be best fostered and directed toward environmental outcomes that are sought locally, regionally and nationally and Two, to support and facilitate implementation of stewardship partnerships to advance

citizen conservation in the general population and to institutionalize citizen participation in the guidance, policies, regulations and operating principles of the BLM and its staff. Underlying the broader purpose of the initiative is a commitment to advance conservation on working landscapes through shared partnerships using a myriad of mechanisms, including:

- New forms of participatory planning and decision-making;
- Innovative management arrangements that incorporate citizens into the care and stewardship of public lands; and
- Educational and programmatic efforts that prepare all stakeholders for partnered stewardship and that promote within the agency a shared culture and commitment to the pursuit of citizen-centered conservation.

Within the foundational framework determined by the Secretary's 4 C's agenda and the new environmentalism of the Administration, the 4 C's Working Group has identified and recommends a series of additional principles and elements necessary to make that framework whole, robust and appropriate to the mission, goal and objectives as set forth, above, for the 4 C's Initiative. The principles spell out what the Working Group deems essential pre-conditions for the establishment of the 4 C's Initiative. The elements, in turn, set forth the minimal structural requirements that the Working Group deems necessary to make the initiative credible, productive and successful.

At the instruction of the Assistant Secretary of Land and Minerals Management, the Working Group reviewed and considered the principles and elements of the framework on federal lands governance proposed by Matthew McKinney for pilot implementation (see Attachment One – **4 C's Tools: Overview and Summary**, Appendix II). The principles promulgated by the Working Group are similar to those identified by McKinney; the framework elements recommended by the Working Group, however, differ (though the topic headings used by McKinney in his review of framework elements are partly replicated in this report). The differences between the two reflect the Working Group's contrasting recommendations for advancing a 4 C's Initiative:

- The initiative should be developed using existing BLM authority; new Congressional authority is not needed at this time. Moreover, reliance on existing planning and management authority, exercised in accordance with NEPA procedures, removes the need for new or special rules on protests and appeals or inclusion of special considerations of protests and appeals in the 4 C's Projects Program.
- The initiative should be designed and directed for agency-wide implementation and institutionalization of the 4 C's; experimentation and pilot testing are not necessary given the existing administrative authority available to the BLM for the 4 C's Initiative and the guiding framework of the President's new environmentalism and the Secretary's 4 C's agenda. The 4 C's are already happening within the agency; the task is to make the 4 C's more persuasive and pervasive within the agency and, ultimately, business as usual.
- The initiative should be local, not national, in its implementation. Oversight and project selection should be performed at the appropriate geographic scale and administrative level (e.g., Field Office).

In light of these considerations, the Working Group recommends that the following principles and elements inform the working framework for the 4 C's Initiative.

Recommended Principles for Enhancing the 4 C's Initiative

PRINCIPAL ONE: *The 4 C's Initiative will be structured and advanced within existing Congressional authority; no additional implementing authority should be sought from Congress until the need for such authority has been established.*

PRINCIPLE TWO: *The 4 C's Initiative will not be an experimental/pilot demonstration program. Its purpose is to advance understanding, full acceptance, implementation, documentation and institutionalization of the 4 C's within the BLM, its staff and its operating culture through 4 C's projects, 4 C's information on available 4 C's tools and appropriate models (provided by projects and lessons learned), and 4 C's capacity building among agency staff, communities and interested public.*

PRINCIPAL THREE: *The 4 C's Initiative will be fully and seamlessly integrated within the Bureau's administration to ensure continuity in ongoing 4 C's innovation, to facilitate planned or proposed 4 C's projects and innovation, and to help field managers more readily aspire to and reach new and higher levels of community stewardship.*

PRINCIPLE FOUR: *The 4 C's Initiative will be fully transparent to the public in all aspects of its operations.*

PRINCIPLE FIVE: *The 4 C's Initiative will be subject to monitoring and public participation in oversight and reporting to further ensure transparency and to communicate credibly to stakeholders the program's record of performance.*

PRINCIPLE SIX: *The mission, goal and objectives of the 4 C's Initiative are enduring, but the formal organization and function of the 4 C's Initiative, consistent with its mission to institutionalize the 4 C's within the agency, will not be permanent; it will have a longevity of no longer than 3-5 years, reversible only if performance and outcome indicators call for continuance of the initiative to complete its stated purpose.*

PRINCIPLE SEVEN: *The 4 C's Initiative will be inclusive, bottom-up and place-based in its operation, activities, and actions; citizen participation in planning will begin at the outset of the process and continue in each step thereafter; projects will be developed by the broadest possible spectrum of citizen involvement, yet defined, structured and implemented by working partnerships between communities of interest and place and the affected BLM field offices.*

PRINCIPLE EIGHT: *To illustrate the flexibility and universality of the 4 C's approach, and to advance the new environmentalism and the 4 C's agenda, the 4 C's Initiative will encourage and support projects across the widest possible spectrum of public land users, issues, geographic areas, applications of 4 C's tools, and combinations of*

administrative jurisdictions that most consistently and substantially contribute to the outcome of full community stewardship of public lands.

Recommended Considerations for Enhancing the 4 C's Initiative

The 4 C's Initiative is designed to disseminate information, establish tools and training, and implement hands-on management for the shared stewardship of America's public lands through community problem solving and action. The 4 C's Initiative strives to move agency, citizen, and community cultures to a coordinated stewardship ethic. The following considerations help identify and frame 4 C's efforts.

(1) Project Development Considerations

- Projects should be developed bottom-up by citizen and/or community groups in partnership with BLM field offices; in all instances, a partnership must be established and in effect between a BLM field office and citizen/community groups and other, if any, participating parties, before a project is eligible for support within the 4 C's Initiative.
- Projects should be developed on a foundation of broad and inclusive community representation and participation (in general, representation and participation is expected to be self-selecting and proportionate to the project's magnitude: landscape level projects are anticipated to enjoy broader participation; site-specific projects are anticipated to have more narrow participation).
- Project development should include a clear identification of participants and the responsibilities of each partner in the shared stewardship endeavor.
- Project development should include a consensus process among partners to clearly identify and define (a) desired project outcomes and (b) measurable indicators and benchmarks that document degree of success in meeting interim and final project outcomes.
- Project development should incorporate and provide incentives for ongoing conservation innovation by all members of the partnership; the Department and the BLM should provide support, direction and guidance to BLM field office managers consistent with this objective.
- Project development should, to the extent appropriate, incorporate or be consistent with the principles of performance, outcome-based management.

(2) Project Eligibility Considerations

- All projects proposed and implemented as partnerships between BLM field offices and citizen/community groups and other participating parties, and that are consistent with the guidelines of the selection criteria described below, are eligible for support within the 4 C's Initiative.
- Projects receiving support within the 4 C's Initiative should engage the advice, consultation and participation of Resource Advisory Councils (RACs) or a RAC sub-group at the earliest possible date and on a regular basis; as a general rule, RACs or a RAC sub-group will be the principal interface or contact point between projects and the general public, ensuring project transparency and accountability.

- Basic support for all projects served by the 4 C's Initiative will include guidance and direction in the design and implementation of projects, access to relevant 4 C's information, tools, and networks, and assistance in identifying potential funding sources; the 4 C's Coordinator (described below) will be responsible for assuring such support.
- Funding for 4 C's projects served by the initiative (whether directed to field offices or their partners) will be in accordance with existing programs and procedures established within the agency.
- Special funding, if any, that may become available to the Assistant Secretary or the Director for purposes of project support within the 4 C's Initiative should be awarded in consultation with the respective State Director for that project and the 4 C's Coordinator in consultation with the 4 C's Working Group. Potential funds that could be targeted to 4 C's efforts include Challenge Cost Share (CCS) and Cooperative Conservation Initiative (CCI) dollars. These monies would be allocated in accordance with existing procedures within the bureau.

(3) *Project Scope*

- Scope of a project should be determined by local BLM and its citizen and community partners.
- Scope of a project should be consistent with and contribute to the mission, goal and objectives of the 4 C's Initiative, including, most critically, advancement of citizen stewardship on public lands.
- Scope of a project should include use of one or more 4 C's tools as defined by or consistent with this report.
- Scope of a project should not be issue or land-use limited: any and all issues and uses on or affecting public lands are appropriate for the scope of a project.
- Scope of a project should include or contribute to landscape level planning and management or address solutions and activities applicable to development of landscape level planning and management through programmatic contributions or site-specific innovations. It is recognized that many projects will not, themselves, be on a landscape scale. Nonetheless, they should be consistent with landscape management objectives.
- Scope of a project should include or contribute to the goal of sustaining working landscapes as measured by indicators of healthy landscapes, vibrant communities and dynamic economies.²
- Scope of a project should include use of inclusive, informed and deliberative processes for decision-making.

(4) *Administrative Considerations*

- Operate program within Interior's existing Congressional authority
- Ensure that program and its projects comply with all relevant federal laws

² Counties will have a major stake in the 4 C's Initiative. A major consideration in determining the proper scope of a project should be the potential contribution of projects, either directly or indirectly, to county economic growth and stability. Many of the projects highlighted in this report indicate the diverse ways the 4 C's Initiative can contribute simultaneously to the guiding mission of conservation and to the focused objective of sustaining working landscapes, so critical to county well-being.

- Revise or develop guidance, policy and rules for consistency with or support of the 4 C's Initiative as needed
- Seek additional implementation and operational authority from Congress only upon thorough evaluation of initiative performance and outcomes over a reasonable period of time and only after full and substantial documentation of legislative needs
- Identify and secure funding for the program within existing National, State and Field Office budgets
- Identify and develop non-appropriated sources of funding for 4 C's projects, including (1) self-funding and (2) private non-profit foundation support
- Maintain existing BLM 4 C's Working Group (1) in advisory capacity to the Assistant Secretary and Director, (2) for performance of principal 4 C's Initiative activities, (3) in support capacity to the 4 C's Coordinator, and (4) as a resource to individual projects
- Establish a sunset provision for the 4 C's Initiative effective no more than 3-5 years from its start (see principles above)
- Establish 4 C's term-appointed Coordinator position in BLM on a term assignment for duration of the initiative; Coordinator duties include but are not limited to:³
 - a. Complete strategic plan for 4 C's Initiative; communicate, cooperate and consult in preparation of plan with broad range of public land users, community groups, community support organizations, the National Association of Counties, and the Western Governor's Association.
 - b. Foster and facilitate and make recommendations to the Director on training opportunities to advance 4 C's skills among bureau personnel.
 - c. Coordinate and assist process for identification, development and selection of projects; initiate outreach to field offices and potential partners to inform those parties of the initiative and its services and to foster general interest in 4 C's projects design, participation and partnership formation.
 - d. Act as a clearinghouse and source of guidance, support and information to 4 C's projects in the field.
 - e. Provide project funding recommendations to the Assistant Secretary and Director when appropriate and provide guidance to project partnerships on potential federal and non-federal sources of funding.
 - f. Coordinate project evaluation and reporting.
 - g. Ensure coordination and integration, where appropriate, with other BLM and Departmental 4 C's efforts, including MIT 4 C's Team, Best Management Practices, Business Planning, Partnership Team, Collaborative Planning, Service First Steering Committee, ADR Collaboration Group, Partnership Series, cooperating partners, and other state and federal agencies; 4 C's Initiative should provide operational support for and integration of all BLM-based 4 C's activities. 4 C's Working Group should be included in this activity.
 - h. Perform 4 C's outreach services for the bureau, including conference presentations, public writings and engagement with other federal agencies for purposes of enhancing and expanding 4 C's applications. These services should be coordinated with similar Departmental activities.

³ A draft 3-year work plan for the proposed coordinator position was developed by Richard Whitley, member of the 4 C's Working Group and tasked to the Assistant Secretary, L&M, from 2/03 to 5/03 for the purpose of assisting in the development of the 4 C's Initiative. The draft work plan is presented in Attachment Three of this report.

- i.* Evaluate administrative tools, options and BMPs that foster agency implementation of the 4 C's and contribute to BLM performance and responsiveness to public; identify 4 C's tools and BMPs for implementation bureau-wide and other tools and BMPs that are situation-specific.
- j.* Coordinate with 4 C's issue groups that may be established by the Director to address and overcome real and potential barriers to success of the 4 C's Initiative (e.g., procurement and contracting, policy and regulatory authorities, budget processes, human capital development – knowledge, skills and abilities, and policy and guidance development for consensus-based and adaptive, outcome-based management).
- k.* Develop net-based and other networking mechanisms to share and disseminate 4 C's information.
- l.* Develop written instructional and guidance materials for 4 C's implementation in the field.
- m.* Provide or coordinate mentoring services to Field Managers and partners seeking assistance in the development of 4 C's projects or activities
- n.* Coordinate with temporary staff (e.g, 4 C's Working Group members) tasked to the 4 C's Initiative for special assignments.
- o.* Develop a list of willing 4 C's coaches and mentors within the bureau and facilitate and coordinate mentoring activities between them and Field Managers who may request such services.
- p.* Continue as an ex-officio member of 4 C's Working Group.
- Operate the 4 C's Initiative from a *virtual, adaptive and flexible* organizational format with the following administrative characteristics:
 - a.* Initiative is fully integrated within the bureau: it is not distinguishable or separable as a unique directorate or bureaucracy; it lacks a physical office or discrete location; structurally invisible, it is wherever the 4 C's are practiced.
 - b.* Initiative has no fixed staff apart from the detail of the 4 C's Coordinator.
 - c.* Temporary or detailed staff to the 4 C's Initiative will come from any units of the organization and will be inclusive of all programs and administrative units that structure the BLM (enhancing mission of 4 C's institutionalization).
 - d.* Initiative will have no traditional administrative portfolio that might otherwise overlap with or interfere with existing bureau structures; its function is to serve, not compete with, and support, not supplant, the existing management configuration of the BLM.
 - e.* Initiative will not compete with WO and states for budget; operational dollars for the Initiative will be proportionate to the emphasis each WO program, state and field office voluntary places on advancement of the 4 C's.

(5) Advisory Components

- Resource Advisory Councils, or designated sub-groups, should be used as primary FACA institutions for providing public input into and public oversight of 4 C's projects within their respective jurisdictions.
- 4 C's Working Group should provide on a request basis advice and assistance in project development and implementation.
- 4 C's Coordinator should coordinate and participate in the evaluation and assessment of projects and report findings to the Director.

- 4 C's Working Group should provide support to the Coordinator in project evaluation, assessment and reporting.

(6) **Project Monitoring** – Monitoring is essential to the success of the 4 C's Initiative. It is intended to (a) inform and direct partners and their project activities toward desired outcomes, (b) provide credibility and transparency to the program, (c) enrich the tool box of available 4 C's tools, (d) expand our understanding of what tools work or do not work, when and where; (e) determine whether a project should continue to be supported by the initiative (however that support is defined) and (f) provide information from which to adjust activities to ensure achievement of desired outcomes. Elements of project monitoring framework include:

- Programmatic, planning and plan implementation projects will regularly be monitored and reported based on the performance standards, interim indicators and benchmarks agreed upon by the partners to measure progress toward outcomes.
- Projects served by the initiative and receiving financial support that is facilitated by or provided through the initiative will submit performance reports to the Coordinator at mutually agreed-upon intervals; all other projects will be encouraged to voluntarily submit to the Coordinator reports detailing 4 C's applications, tools, barriers and outcomes for inclusion in the 4 C's network data base. [Director should issue an instruction memorandum requesting appropriate reporting by partners to Coordinator to ensure integrity and maximum utility of a 4 C's data base.]
- Continued support for projects by the 4 C's Initiative will be contingent on monitoring results that (1) integrate with and enhance management; (2) confirm project progress toward outcomes; or (3) redirect project efforts on a track consistent with reaching desired outcomes.
- The Coordinator, with assistance from the 4 C's Working Group, shall (1) review all performance reports for projects receiving initiative funding, or facilitated funding, and report to the Assistant Secretary and Director on the status of those projects and (2) review monitoring and informational reports voluntarily submitted from all other 4 C's projects and incorporate relevant 4 C's findings, applications, lessons and models into the 4 C's network data base for access and use by field managers and other partners.
- RACs and other advisory/oversight entities that may be established should have access to performance reports and associated monitoring data, and may, as appropriate, provide recommendations to the State Director for the continuation or termination of program support for individual projects. The State Directors will make recommendations to the Coordinator. [Assistant Secretary and Director shall be notified of recommendations to terminate project support.]
- Project participants will meet annually within regions or nationally through agency satellite communication facilities to exchange ideas, document lessons learned, and identify what works, what doesn't work, and why; alternatively, participants will report the same information through their RACs in national RAC meetings. The latter option may be more efficient and preferable in terms of public information and transparency.

(7) **Departmental Participation** – Consistent with the bottom-up, self-determining character of the 4 C's Initiative, the Department's role in the bureau effort should be limited to

provision of assistance and support when requested by project partners. That assistance and support includes:

- Departmental support for inter-agency cooperation and data/information sharing
- Departmental support for removal of barriers impeding 4 C's implementation
- Departmental support for improving NEPA procedural requirements in conformance with NEPA intent and consistent with the 4 C's (including support for reciprocal actions by CEQ)
- Departmental revision of all relevant elements in its manual for consistency with the 4 C's and the 4 C's Initiative
- Departmental support for 4 C's innovation in the implementation of the ESA and other environmental requirements in project areas
- Continuous Solicitor support for the 4 C's Initiative at the Washington level to:
 - a. Review 4 C's projects for procedural sufficiency
 - b. Review 4 C's projects for consistency with non-delegation rule
 - c. Provide legal assistance to Coordinator regarding 4 C's Initiative and its projects and activities
 - d. Engage Departmental assistance in FACA interpretation and application as it relates to operation of the 4 C's Initiative