



National Bobwhite Technical Committee

2010 - 2011 Steering Committee

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November 16, 2010

Mr. Lynn Tjeerdsma
Assistant Deputy Administrator for Farm Programs
Ag Stop 0510, Room 3612
1400 Independence Ave. SW
Washington, DC 20250

Dear Mr. Tjeerdsma:

The National Bobwhite Technical Committee (NBTC) appreciates the opportunity to recommend changes to the Conservation Reserve Program (CRP) Environmental Benefits Index (EBI) to further enhance bobwhite and grassland bird habitat. The NBTC is composed of State Fish and Wildlife Agency representatives from the 34 States included in the range of northern bobwhite. General CRP is crucial to successful implementation of the National Bobwhite Conservation Initiative (NBCI) and the stabilization of grassland bird populations. To that end we respectfully suggest two modifications in the current EBI that will maximize CRP's effectiveness for quail and other grassland bird habitat.

1) Simplify the EBI

We support a simplified version of the EBI, similar to that proposed by the Association of Fish and Wildlife Agencies (AFWA) on 29 October 2010. Members of the NBTC support the AFWA recommendations on the N1 and N4 sections outlined in the attached table, and the removal of the N5 section. The NBTC supports additional modifications to the N4 section increasing specific wildlife-friendly practices, adding points for the planting of longleaf pine where ecologically appropriate and mitigation of other ecological problems.

2) Establish a National "Do Not Plant" list

The NBTC fully supports the creation of a national "Do Not Plant" list. Changes to the EBI over the years have helped discourage establishment of non-beneficial wildlife plants. However, because the EBI currently has six factors, many fields planted to these species have scored enough points on their contracts under other soil and water concerns to be reenrolled in the program. If a national "Do Not Plant" list was adopted for future CRP signups, fields could not be planted to any species on the list. Offered fields currently planted to these species would need to agree to at least a 90% conversion to qualifying species. Such a change would help simplify the N1 factor of the EBI by eliminating the need for low point scores for these plant species under the old N1a section and move "conversion points" for more wildlife friendly covers from the old N1b to N4b. More important, a "Do Not Plant" list would substantially improve the overall wildlife and societal values of CRP nationwide and reduce future invasive species issues.

We recommend FSA consult with NBCI's FSA liaison Bridget Collins and with NRCS National staff regarding implementation of a National CRP "Do Not Plant list" before an anticipated general CRP sign-up in FY 2011 for new acres and re-enrollments. This list would provide direction to states that will need to revise their seeding mixtures.

Based on input from NBTC experts across bobwhite range, as well as wildlife professionals AFWA consulted with across the nation we suggest the following species be included on a national CRP “Do Not Plant” list:

- Tall Fescue (*Schedonorus phoenix*) – a non-native grass
- Reed Canary Grass (*Phalaris arundinacea*) – a native grass with invasive characteristics
- Bermudagrass – (*Cynodon dactylon*) – a non-native grass
- Lehmann Lovegrass - (*Eragrostis lehmanniana*) – a non-native grass
- Weeping Lovegrass (*Eragrostis curvula*) - a non-native grass
- Crested Wheatgrass (*Agropyron cristatum*) – a non-native grass
- Old World Bluestem (*Bothriochloa* spp.) species and cultivars– non-native grasses
- Bahiagrass (*Paspalum notatum*) – a non-native grass
- Klein Grass (*Panicum coloratum*) – a non-native grass
- Sericea lespedeza (*Lespedeza cuneata*) – a non-native perennial legume

The consensus of the majority of Federal, State, and other wildlife resource professionals is these species have little value to wildlife. Additionally, many of these species are also invasive and degrade surrounding wildlife habitat. This continued loss of native habitat increases declining species chances of becoming threatened or endangered, which has potential negative impacts on producers. Since some states also face other invasive plant threats we suggest that NRCS State Technical Committees have the discretion to add other species to a state Do Not Plant list and bar their use on CRP in their states.

Because of the seriousness of their impact, the NBTC opposes allowing any state or local committee the discretion to remove species from the national “Do Not Plant” list. Given the undesirable nature of these species for wildlife, exempting any one of them at a state or local level could negate the wildlife and societal benefits intended from such a list and impact the proposed EBI ranking system changes.

We realize that this recommendation will not be popular in states where these species are commonly used. The short term advantages of cost savings and ease of establishment provided by these species are greatly outweighed by the long term costs required to reestablish declining species habitat that would have been unnecessary if appropriate native species had been planted in the first place. CRP plantings in lesser prairie chicken range are a prime example of this situation. In Kansas where only native grass plantings on CRP were allowed, lesser prairie chicken numbers increased and their range expanded. In Oklahoma, Colorado, New Mexico and Texas where exotic invasive grasses found on the list were planted on millions of acres of CRP, lesser prairie chicken numbers declined to the point of U.S. Fish and Wildlife Service being forced to determine whether they should be considered threatened or endangered species. Even when native grasses are replanted on 51% of the site containing these problem species, the native plantings are often overwhelmed by the aggressive nature of the plants on this list, compounding the problem of reestablishing native habitat, greatly increasing its cost and lowering its chances of success.

Because producers choose these problem species due to their lower initial out of pocket costs we respectfully suggest that FSA consider providing Signup Incentive Payments (SIPs) for establishing more expensive but higher quality seeding mixes that have proven beneficial to wildlife and pollinators in areas containing at-risk species.

We thank you for the opportunity to comment on the CRP and eagerly look forward to building our NBTC and FSA partnership, for the mutual benefit of agricultural producers and bobwhite and grassland bird resources. Ms. Bridget Collins, NBCI liaison to the FSA, is available to work with you further on this issue.

Sincerely,



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National EBI as modified in the Association of Fish and Wildlife Agencies and National Bobwhite Conservation Initiative proposals. Specific AFWA changes are highlighted in yellow, with NBTC changes to the AFWA proposal in red.

$$\text{National EBI Score} = N1 + N2 + N3 + N4 + N5 + N6$$

National Bobwhite Technical Committee Proposal November 16, 2010

Factor	Max Pts	Equation/Scoring Parameters
N1	100	<p>Wildlife Habitat Cover Benefits (0 to 100 points)</p> <p>$N1 = (N1a + N1b)$</p> <p>N1a is the cover subfactor (0 to 70 points) Weighted average of covers determines points.</p> <p>N1b is Wildlife priority area (0 or 30 points) 30 pts if 51% of the field lies within a national or state priority area based on vegetative practice that best benefits species listed, otherwise 0 pts.</p>
N2	100	<p>Water Quality Benefits From Reduced Erosion, Runoff, and Leaching (0 to 100 points)</p> <p>$N2 = (N2a + N2b + N2c)$</p> <p>N2a is the water quality priority area subfactor (0 or 30 points) 30 pts if 51% of the field lies within a national or state priority area, otherwise 0 pts.</p> <p>N2b is the groundwater quality subfactor (0 to 25 points)</p> <p>N2c is the surface water quality subfactor (0 to 45 points)</p>
N3	100	<p>On-Farm Benefits of Reduced Erosion (0 to 100 points)</p> <p>Weighted average of the 3 dominant soils. Score should reflect both water and wind erosion.</p>
N4	30	<p>Priority Resource Benefits (0 to 30 points)</p> <p>Points awarded for all factors (maximum of 30 points) that provide increased environmental benefits. Applicant can choose more than one option not to exceed 30 points.</p> <p>a) contracts with existing, restored, or restorable wetlands – 20 pts</p> <p>b) conversion of at least 90% of a primarily monoculture or “Do not plant” species stand to a \geq 40 point vegetative species mix – 30pts</p> <p>c) establish rare habitat (CP25) – 30 pts</p> <p>d) establish longleaf pine or hardwood trees (CP3A) <i>where ecologically appropriate</i> – 10pts</p> <p>e) plant site appropriate pollinator friendly seed mix – 20 pts</p> <p>f) plant a wildlife food plot – 5 pts</p> <p>g) located within an air quality area – 20 pts</p> <p>h) Carbon sequestration factors (5 to 10 points)</p> <p>Weighted average of cover practice planted</p> <p>5 points – Single species grasses planted</p> <p>8 points – Mixed species grasses planted (CP2, CP4D, CP25)</p> <p>10 points – Tree Practices (CP3, CP3A)</p>
N5	45	<p>Air Quality Benefits (0 to 45 points)</p> <p>$N5 = (N5a + N5b + N5c + N5d)$</p> <p>N5a is the wind erosion impacts subfactor (0 to 25 points)</p> <p>N5b is the wind erosion soils list subfactor (0 or 5 points)</p> <p>N5c is the air quality zone (0 or 5 points)</p> <p>N5d is carbon sequestration factor (3 to 10 points)</p> <p>Weighted average of cover practice planted</p>

~~10pts – Tree Practices (CP3, CP3A, CP11)~~
~~3-5pts – Grass Practices (CP25, CP4d, CP2, CP1, CP10)~~

N6	100	Cost Factor N6 = N6a + N6b N6a Soil Rental Rate (75 points) Offers with the lowest soil rental rates receive highest point scores. N6b Offer Rate (0 - 25 points) Points awarded to offers that are less than the maximum SRR up to \$15.