

1 Natives First – Consider Native Vegetation First.

3 INTRODUCTION

4 Strategic conservation initiatives have been developed by Partners in Flight (PIF), the North American Grouse Partnership
5 and the National Bobwhite Technical Committee (NBTC) to conserve the following suite of eastern grassland birds that
6 are experiencing serious long-term declines and have been determined to be high priority:

7 Loggerhead shrike
8 Eastern meadowlark
9 Eastern kingbird
10 Dickcissel
11 Grasshopper sparrow
12 Henslow’s sparrow
13 Greater prairie-chicken
14 Northern bobwhite

15 The extensive, long-term population declines of these eastern grassland birds have been due predominantly or partly to
16 the diminished quantity and quality of grassland habitats through the landscape-scale degradation of native rangeland
17 and grasslands and conversion to croplands and/or non-native introduced forages. During the period of 2008 – 2012 it is
18 estimated over 1 million acres of long-term grassland (not cultivated for at least 4 decades) were lost to cropland
19 conversion. (Lark, Salmon, & Gibbs, 2015)

20 The National Bobwhite Conservation Initiative (NBCI), an initiative of the National Bobwhite Technical Committee (NBTC),
21 is the 25-state, unified strategy to restore wild quail. The NBCI, originally published in 2002, recently has been revised as
22 the NBCI 2.0 (March 2011; see <http://bringbackbobwhites.org/conservation/nbci-2-0/>). The NBCI identifies landscape-
23 scale habitat restoration on major land-use types such as grazing lands, croplands and forest lands as crucial for bobwhite
24 and grassland bird restoration across 25 states.

25 The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) and Farm Service
26 Agency (FSA) have a prominent influence on the management and conservation of croplands and grazing lands, two of
27 the highest-priority land-use types identified by the NBCI for native grassland habitat restoration. Excluding fish and
28 wildlife habitat the Environmental Quality Incentives Program (EQIP) enrolled nearly 1.9 million acres annually 2009 –
29 2014 in practices that could be planted to native vegetation. (USDA-NRCS, 15 June 2016) and the 49th CRP sign-up enrolled
30 410,733 acres, with roughly 80% being practices which could be planted to native grasses and forbs. Thus, USDA has a
31 prominent role in shaping the future prospects for restoration of the suite of declining eastern grassland birds.

32 No Net Loss / Net Gain

33 The envisioned scale of native grassland habitat net gain is achievable on working agricultural and conservation lands with
34 the same two-phase approach used to achieve “no net loss / net gain” of wetland habitats:

- 35 1) End or minimize losses and degradation;
- 36 2) Accelerate restoration gains.

37 That is, stemming the loss and degradation of rangeland and eastern native grassland habitats is as important to
38 achieving an eventual net gain as is promoting restoration.

39 Over the last 15 and more years, myriad conservation agencies, including USDA, and organizations have provided
40 increasing funding and capacity to restore and manage eastern native grassland habitats. However, ongoing losses and
41 degradation of native grassland habitats continue to offset the potential gains. Every acre of converted or degraded
42 grassland habitat makes “net gain” more difficult to achieve.

43 PROBLEM

44 USDA subsidized loss and degradation of eastern native grassland and rangeland habitats continues to impede progress
45 toward a net gain of suitable habitats. With respect to NRCS practice standards, net gains of eastern native grassland
46 habitats on working croplands and forage lands and rangeland health is impeded by ongoing technical and financial
47 assistance that fosters spread of aggressive, introduced grasses on forage lands, soil and water conservation practices on
48 croplands and some FSA Conservation Reserve Program (CRP) enrollments.

49 USDA programs, policies and financial support are many times working in direct conflict. For example, certain
50 Environmental Quality Incentives Program (EQIP) and Conservation Security Program (CSP) practices provide financial
51 assistance for pasture enhancement, forage establishment, soil conservation and water quality by planting aggressive
52 non-native introduced grasses that provide poor habitat quality. Simultaneously, other EQIP and CSP practices provide
53 assistance to eradicate aggressive introduced species and replace them with native vegetation for habitat
54 establishment/conservation. This situation of counter-acting practices undermines the achievement of priority natural
55 resource conservation goals. Thus, USDA is working against itself and against its many conservation partners who are
56 collaborating to restore native habitats and ecosystems.

57 Scasta et al. (Scasta, Engle, Fuhlendorf, Redfearn, & Bidwell, 2015) in a meta-analysis of literature found, “The overall
58 effect of exotic forage invasion across all metrics and species was negative”. Exotic forage had negative effects on the
59 soil/water processes and soil microbial communities. Exotic forages resulted in changes in the natural disturbance patterns
60 which support endemic species, both plants and animals and they likely depressed wildlife (the authors did not specifically
61 look at the effects on wildlife). Exotic forages through their selection process, or existing characteristics exhibit features
62 commonly associated with invasive species, such as high seed production and strong persistence. Scasta et al. suggest that
63 exotic forages be considered a special sub-set of invasive species. The authors go on to recommend the role of government
64 oversight in the introduction of exotic forages needs to be reconsidered.

65 Further, NRCS policies and technical standards that promote aggressive introduced species has negative impacts beyond
66 the agency. The NBTC and its partners have requested that the USDA Farm Service Agency (FSA) institute a “Do Not Plant”
67 list for the Conservation Reserve Program, to meet the congressional goal of promoting wildlife habitat. FSA rejected the
68 request, citing current NRCS technical and financial support for each of the most problematic aggressive introduced
69 species on the proposed Do Not Plant list.

70 A recent review of the literature (Ashworth, 2011) revealed that native vegetation is comparable to or better than the
71 commonly used introduced species for soil conservation, soil health, water quality and air quality. Native vegetation has
72 long been recognized for its superiority for wildlife. Research also supports native vegetation as equal or higher quality
73 forage than introduced species during their appropriate growing season, leading to sustained or increased weight gains
74 and better animal health. These multiple benefits are environmentally and economically sound, making native vegetation
75 a viable and preferred alternative to non-native introduced species for all conservation purposes.

76 References

- 77 Ashworth, A. (2011). *Native warm-season grass roles in water and soil conservation: a literature synthesis*. University of
78 Tennessee, Department of Forestry, Wildlife and Fisheries. Knoxville: Center for Native Grasslands Management.
- 79 Lark, T. J., Salmon, J. M., & Gibbs, H. K. (2015). Cropland Expansion Outpaces Agricultural and Biofuel Policies in the
80 United States. *Environmental Research Letters*, 10.
- 81 Scasta, J. D., Engle, D. M., Fuhlendorf, S. D., Redfearn, D. D., & Bidwell, T. G. (2015). Meta-Analysis of Exotic Forages as
82 Invasive Plants in Comple Multi-Functioning Landscapes. *Invasive Plant Science and Mangement*, 8(3), 292-306.
- 83 USDA-NRCS. (15 June 2016). Washington, DC.: Natural Resources Conservation Service. Retrieved from
84 http://www.nrcs.usda.gov/Internet/NRCS_RCA/reports/fb08_cp_eqip.html

PROPOSAL

The Natives First Coalition requests that the U.S. Department of Agriculture take a significant step toward conserving and restoring eastern native grassland and preserving native rangeland habitats and species on private working and conservation land by establishing a national policy that significantly reduces or eliminates the use of aggressive introduced plants and promotes the adoption and use of locally adapted native plants for as many soil, water and wildlife conservation applications as possible. Through this action, USDA programs and practices would provide a positive landscape-scale impact for restoring declining grassland birds and at-risk wildlife impacted by loss of native grassland habitat nationwide.

The Natives First Coalition proposes that USDA adopt a national policy (as have other federal agencies; FWS, BLM, USFS and NPS) that establishes a preference for native plants wherever feasible in all USDA conservation and working lands programs and the subsequent operations, technical assistance, practices, cost-share and other financial assistance. Such a policy should:

- 1) Place no regulatory restrictions upon private landowners;
- 2) Promote adoption and use of native plants for most purposes;
- 3) Allow flexibility for cost-sharing of non-aggressive introduced plants; and
- 4) Eliminate financial assistance for new USDA program enrollments using aggressive introduced species.

Private Property Disclaimer

Nothing in this proposal would restrict the options or rights of any private landowner to plant anything they wish on their own property with their own money. This proposal only affects those options that would be cost-shared with public funds.

PURPOSE:

To maximize net positive ecological and societal benefits of USDA conservation and working lands programs by adopting a native plants preference and eliminate financial assistance for aggressive introduced species; proactively address declining grassland species to avoid listing anxiety; reduce the increasing regulatory impacts caused by wildlife species listed due to loss of native habitat; and improve resiliency to climate change through the proper use of locally adapted native species.

NEW POLICIES

- A. Establish a national policy that requires appropriate native plants to be the first option whenever USDA uses public funds for technical assistance, cost-share or incentives to establish, restore or rehabilitate vegetation.
 - a. Technical assistance would promote the use of native vegetation on all sites where such native material is appropriate.
 - b. Public cost-share, practice payments and incentive funds will be approved only for native species except in the cases of the exceptions defined below for non-aggressive introduced species or availability.
 - c. Establishment of invasive or aggressive introduced species will not be cost-shared with public funds.
 - d. Adapted cultivars or releases of native species will be allowed for all purposes other than remnant native rehabilitations or restorations.
 - i. Local ecotypes are acceptable if appropriate seed quality documentation is available.
- B. Establish principles for acceptable types of introduced plant materials that can continue to be cost-shared by USDA:
 - a. Should be non-aggressive
 - i. Should not outcompete the naturally occurring or reestablishment of the native plant community.
 - ii. Must not invade plant communities outside the project area.
 - iii. Should not exchange genetic material with common native plant species.
 - iv. Where applicable, should be short-lived and act as a nurse crop that readily yields to native, perennial vegetation.

- 131 v. Should be self-pollinating to prevent gene flow into the native community, or sterile to prevent
132 escape from cultivation.
- 133 C. Establish principles for acceptable circumstances when the above-defined non-aggressive, introduced species may
134 continue to be cost-shared by USDA instead of native species:
- 135 a. If suitable native species are not available for the area;
- 136 i. Developing suitable native species where currently unavailable should be a priority at Natural
137 Resources Conservation Service (NRCS) Plant Material Centers (PMC).
- 138 b. In emergency conditions to protect basic resource values such as soil stability and water quality;
- 139 c. As an interim, non-persistent measure designed to aid in new establishment of native plants;
- 140 d. If natural resource management objectives, based upon sound scientific data, cannot be met with native
141 species;
- 142 e. When analysis of ecological site inventory information (Ecological Site Description (ESD)) using state and
143 transition models indicates that a site will not support reestablishment of any suitable native species
144 that historically were part of the natural environment;
- 145 f. In defined circumstances where inexpensive, non-aggressive, introduced species are the preferred
146 alternative for wildlife habitat (such as green fire breaks, food plots, legumes or dense nesting cover),
147 but only as approved on a state-by-state basis with concurrence of the state wildlife agency and U.S.
148 Fish and Wildlife Service.
- 149 g. In grazing systems as part of a prescribed grazing plan which includes native vegetation in an
150 appropriate quantity to act as an integral component of the prescribed grazing plan.
- 151 i. Under no circumstances should existing remnant or planted native vegetation be replaced by
152 introduced species.

153 ACTIONS

- 154 A. All USDA practice standards and list of approved plants for all programs will be reviewed and revised, according
155 to this new policy, with opportunity for public participation and comment.
- 156 a. Develop a list of excluded aggressive introduced species for regions of the US. (see Table 1.)
- 157 B. USDA will track the use (in terms of acres and dollars) of vegetation planted, differentiating between native species
158 and introduced plants subsidized with public cost-share and incentive funds.
- 159 C. In areas where appropriate native plant materials are limited and heavy reliance on non-aggressive introduced
160 plants is determined to be still needed, NRCS PMC's will launch an initiative to develop appropriate native
161 materials needed to replace the introduced materials.

162 BENEFITS

163 [Maximize public conservation benefits of public funds.](#) A demonstrated preference for native plants when public
164 funds are involved would amplify USDA's ability to provide in addition to traditional resource benefits, multiple resource
165 benefits to ecosystem services, soil health, native pollinators, crop pest predators, grassland birds, at-risk species and
166 other socially and economically important wildlife that producers and society expect when public money is invested into
167 private lands.

168 [Voluntary conservation.](#) Participation in USDA programs would remain voluntary. A native vegetation policy would have
169 no impact on a producer's ability to participate.

170 [Cost-effective conservation.](#) A native plant policy would have high conservation benefits with minor budget impact but
171 significant economic benefit.

172 [Accelerating institutional transitions.](#) A national native plant policy for USDA would accelerate ongoing evolutionary
173 transition toward natural ecological processes among federal agencies, University Extension programs, conservation
174 organizations, and landowners, to embrace and promote the multiple benefits and conservation significance of native
175 plants and ecosystems. It is the next logical step for an agency that is currently developing ecological site indexes for all
176 soils in the U.S.

177 [Establishing consistency within USDA.](#) A native plant policy would reduce and eventually minimize cases of USDA
178 working at cross-purposes with itself – subsidizing the eradication of aggressive or invasive species in some programs
179 while subsidizing aggressive or invasive species in other programs, to the detriment of ecosystem functions and priority
180 wildlife species. This policy will save taxpayer dollars in the long run.

181 [Increasing consistency and collaboration among Federal agencies.](#) At least four other Federal conservation agencies
182 (the US Forest Service, Bureau of Land Management, the National Parks Service, and the US Fish and Wildlife Service) have
183 adopted policies favoring native plants. Although USDA has made significant contributions to native plant restoration,
184 USDA funds and programs continue to substantially promote and support establishment of introduced plant species, in
185 some cases replacing natives with introduced species.

186 [Stimulating investment in native plant materials research and development.](#) Although NRCS and other public and
187 private partners have made significant advancements in developing commercially available native plant materials, USDA’s
188 adoption of a native plant policy would accelerate further research and development to meet remaining native plant
189 materials needs for arid lands, forage, biofuel and erosion control.

190 [Increasing demand for native plants.](#) A native plant policy by USDA would create a beneficial chain reaction that
191 eventually would result in increased supply and decreased prices of native plant materials and seeds across the nation,
192 supporting/expanding the native seed industry and associated jobs.

193 [Solidify the agency’s position as a leader in conservation.](#) A native vegetation policy would further demonstrate the
194 agency’s leadership role in adopting an ecological and economically sound policy.

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198 Table 1. Example list of aggressive introduced plant species to be excluded from cost-share projects.

199

200 Bermudagrass (*Cynodon dactylon*)

201 Giant reed (*Arundo donax*)

202 Kentucky bluegrass (*Poa pratensis*)

203 Oldworld bluestem (*Bothriochloa species*)

204 Reed canary grass (*Phalaris arundinacea*)

205 Smooth brome grass (*Bromus inermis*)

206 Toxic endophyte tall fescue (*Schedonous arundinaceum*)

207 Crested wheatgrass (*Agropyron cristatum*)

208 Lehman lovegrass (*Eragrostis lehmanniana*)

209 Sericea lespedeza (*Lespedeza cuneata*)

210 Buffelgrass (*Pennisetum ciliare*)

211 Johnsongrass (*Sorghum halepense*)

212 Kleberg’s bluestem (*Dichanthium annulatum*)

213