

Natives First V1.1 – Consider Native Vegetation First. More than Wildlife, for All Life.

INTRODUCTION

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

- Loggerhead shrike
- Eastern meadowlark
- Eastern kingbird
- Dickcissel
- Grasshopper sparrow
- Henslow's sparrow
- Greater prairie-chicken
- Northern bobwhite

The extensive, long-term population declines of these eastern grassland birds have been due predominantly or partly to the diminished quantity and quality of grassland habitats through the landscape-scale degradation of native rangeland and grasslands and conversion to croplands and/or non-native introduced forages. During the period of 2008 – 2012 it is estimated that 1.6 million acres of long-term grassland (not cultivated for at least 4 decades) were lost to cropland conversion. (Lark, Salmon, & Gibbs, 2015)

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

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

No Net Loss / Net Gain

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

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

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

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

44 PROBLEM

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

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

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

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

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

77 References

- 78 Ashworth, A. (2011). *Native warm-season grass roles in water and soil conservation: a literature synthesis*. University of
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- 82 Scasta, J. D., Engle, D. M., Fuhlendorf, S. D., Redfearn, D. D., & Bidwell, T. G. (2015). Meta-Analysis of Exotic Forages as
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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 the use of introduced plants and promotes the adoption and use of regionally appropriate plant releases or ecotypes of 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, pollinators and at-risk wildlife impacted by loss of native grassland habitat nationwide while also improving soil health.

To help restore declining upland game birds and other wildlife we propose that the Farm Bill direct USDA to adopt a standard for native vegetation that would apply to private conservation and working lands, where feasible and appropriate. Such a standard should:

- Be voluntary and non-regulatory;
- promote the adoption and use of native plants for most purposes;
- allow flexibility for using selected non-aggressive introduced plants that do provide habitat benefits; and
- prioritize financial assistance for native plants in new USDA program enrollments.

PURPOSE:

To maximize net positive ecological and societal benefits of USDA conservation and working lands programs by adopting a native plants preference and prioritizing financial assistance for native species; proactively address declining grassland species, including pollinators, to avoid endangered or threatened species 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 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 feasible and appropriate.
 - b. Public cost-share, practice payments and incentive funds will be prioritized only for native species.
 - c. Establishment of invasive or aggressive introduced species will not be cost-shared with public funds.
 - d. Any native plant material will be allowed, including releases and local ecotypes, provided they are regionally adapted and appropriately matched to the landowner's objectives
 - i. All seed must be tested by a registered seed technologist and meet USDA seed quality standards.
- B. Establish principles for acceptable types of introduced plant materials:
 - 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.
 - v. Should be self-pollinating to prevent gene flow into the native community, or sterile to prevent escape from cultivation.
- C. Establish principles for acceptable circumstances when the above-defined non-aggressive, introduced species may continue to be cost-shared by USDA instead of native species:
 - a. If suitable native species are not available for the area;
 - i. Developing suitable native species where currently unavailable should be a priority at Natural Resources Conservation Service (NRCS) Plant Material Centers (PMC).

- b. In emergency conditions to protect basic resource values such as soil stability and water quality;
- c. As an interim, non-persistent measure designed to aid in new establishment of native plants;
- d. If natural resource management objectives, based upon sound scientific data, cannot be met with native species;
- e. When analysis of ecological site inventory information (Ecological Site Description (ESD)) using state and transition models indicates that a site will not support reestablishment of any suitable native species that historically were part of the natural environment;
- f. In defined circumstances where inexpensive, non-aggressive, introduced species are the preferred alternative for wildlife habitat (such as green fire breaks, food plots, legumes or dense nesting cover), but only as approved on a state-by-state basis with concurrence of the state wildlife agency and U.S. Fish and Wildlife Service.
- g. In grazing systems as part of a prescribed grazing plan which includes native vegetation in an appropriate quantity to act as an integral component of the prescribed grazing plan.
 - i. Under no circumstances should existing remnant or planted native vegetation be replaced by introduced species.

ACTIONS

- A. All USDA practice standards and lists of approved plants for all programs will be reviewed and revised, according to this new policy, with opportunity for public participation and comment.
 - a. In collaboration with the State Technical Committee, US Fish and Wildlife Service and state fish and game agencies, develop a list of excluded aggressive introduced species, for regions of the US.
- B. USDA will track the use (in terms of acres and dollars) of vegetation planted, differentiating between native species and introduced plants subsidized with public cost-share and incentive funds.
- C. In areas where appropriate native plant materials are limited and heavy reliance on non-aggressive introduced plants is determined to be still needed, NRCS PMC's will launch an initiative to develop appropriate native materials needed to replace the introduced materials.

BENEFITS

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

Voluntary conservation. Participation in USDA programs would remain voluntary. A native vegetation policy would have no impact on a producer's ability to participate.

Cost-effective conservation. A native plant policy would have high conservation benefits with minor budget impact but significant economic benefit.

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

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

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

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

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

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