



Testimony of  
Emily B. Roberson, Ph.D., Director  
**Native Plant Conservation Campaign**

Regarding  
Botany Programs of the Bureau of Land Management and the U.S. Forest Service, the Recovery Program of the U.S. Fish and Wildlife Service, Prevention and Control of Invasive Non-Native Species, Native Plant Materials Development, and Response To Climate Change.

April 11, 2007

The Native Plant Conservation Campaign (NPCC) is a nationwide network of native plant science and conservation organizations. The NPCC is a project of the Center for Biological Diversity. Currently the NPCC represents 38 affiliate native plant societies, botanic gardens, and other groups, speaking for more than 80,000 scientists and laypersons. NPCC members rely on public lands and botanical resources for education, research, and recreation. The NPCC requests that Congress augment the budget of the Bureau of Land Management (BLM) by \$21,748,962 and that of the U.S. Forest Service (USFS) by \$16,112,082 to adequately staff botany programs within these agencies. We further request a minimum of \$100 million for the Fish and Wildlife Service (FWS) Recovery Program budget to begin to address the backlog in recovery plan development and implementation, and \$600 million for invasive non-native species inventory and control. We also request a minimum of \$10 million for the BLM and USFS Native Plant Materials Development Programs. Finally we recommend a new budget line item to allow the USFS and BLM to identify and protect plant species and communities at high risk from climate change.

## **Background**

### **A. Land Management Agency Staffing**

Land management agencies do not employ enough botanists adequately to manage and protect our flora. Nationwide, the BLM employs approximately 65 botanists to manage vegetation on its 264 million acres (1 botanist/4 million ac.). The USFS employs approximately 200 botanists across 191 million acres of National Forests (1 botanist/1 million ac.). This is a serious problem for a number of reasons.

First, America's native plants and public lands are central to the nation's quality of life and economic well being. The health of native vegetation controls the value and amount of goods, services and enjoyment that taxpayers derive from our public lands. The quality and quantity of water and flood control yielded by public lands, for example, depends on the status of vegetation. Second, butterflies, trout, songbirds and all wildlife that the public enjoys require healthy native plant communities for survival. Third, species conservation, recreation, commodity production and all other programs require input and review from qualified botanists to avoid resource damage, controversy and litigation. Public lands provide habitat for thousands of federally designated "sensitive" plants, any of which may become eligible for federal listing if mismanaged. Finally, as climate change accelerates, its impacts to plants and other resources on public lands will increase. Changes in fire management, expanded pest and invasive species detection, prevention and control, and more active conservation of rare species are among the requirements if we are to attempt to protect public resources from climate change impacts. Staffing levels are simply inadequate to meet agencies' duties to taxpayers and resources.

*The Native Plant Conservation Campaign promotes appreciation and conservation of native plant species and communities through collaboration, education, law, policy, land use and management*

A project of the Center for Biological Diversity \* [www.BiologicalDiversity.org](http://www.BiologicalDiversity.org)

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## **B. Recovery of Listed Plants**

The Endangered Species Act (ESA) is one of the most popular and successful laws in the U.S. Recovery of imperiled species and their removal from the endangered species list is the primary goal of the law.

Although the most recent data show that only 33% of listed species are in stable or improving condition and that recovery goals are being met for fewer than 25% of listed species, the President's 2008 budget request would *cut the recovery program by 7.5%*, nearly \$5.5 million.

Plant programs are disproportionately underfunded and understaffed. The vast majority of plant recovery plans are not adequately implemented; many are not implemented at all: 57% of listed species are plants; however, *less than 3% of federal endangered species funding went to plants in FY 2004*. The FWS has a recovery ranking system based on likelihood of recovery and degree of threat to each listed species and a priority system for recovery tasks. We suggest that this system be used as the basis for more equitable recovery budgeting.

## **C. Invasive Non-Native Species**

Invasive non-native species including weeds, such as many thistles, pests, and diseases such as Sudden Oak Death cause more than \$123 billion in economic losses in the United States each year. Scientists implicate non-native species in the decline of 49% of federally listed species (57% of plants). Invasive non-native plants (weeds) already dominate millions of acres of federal lands and are spreading exponentially. These infestations reduce the quality and quantity of goods and services that public lands can deliver, including recreation, timber and forage, wildlife habitat, water supply, flood control, and water purification. Moreover, as climate change accelerates, invasive species will be able to infest many new areas that were previously unavailable, bringing the adverse impacts and costs with them. Weeds also can increase erosion and fire hazard. According to USFS, the current funding level of approximately \$25 million allows the agency to control *less than 2% of the current range expansion* of invasive weeds, much less eradicate existing infestations.

## **D. Native Plant Materials Development – USFS and BLM**

The purpose of this program is to develop seed of local native plants to be used for restoration and revegetation projects on federal lands. The use of native plant materials ensures sustainable, successful revegetation and restoration of public lands, helps maintain local biological diversity, improves the resiliency of ecosystems, and maintains a sustainable flow of goods and services from public lands. This practice will become more important as climate change destabilizes ecosystems throughout public lands.

## **E. Climate Change Response – Giving Plants a Fighting Chance**

The scientific community is recognizing climate change increasingly as a threat both to humans and to other species (see recent Intergovernmental Panel on Climate Change Fourth Assessment Report). For this reason, it has become necessary to begin to manage public resources, including rare species and plant communities, to minimize and/or mitigate climate change threats. We recommend a species and plant community climate risk assessment as a first step.

## REQUEST

### A. Land Management Agency Staffing

The following augmentations are the minimum necessary to begin to move the agencies towards adequate botany staffing:

- Each USFS Ranger District should be staffed with at least one full time series 430 botanist.
- There are 156 BLM field offices, responsible for from several thousand to several million acres. We propose that BLM nationwide employ one series 430 botanist for each 500,000 acres under management. At minimum each BLM field office should be staffed with one full time botanist.

Based on a GS-11 Step 1 base salary with no locality adjustment (currently \$46,974/yr), these staff levels would require the following budget augmentations:

Agency	Current FTEs	FTE Goal	Needed	Additional Cost (vs. current budget)
USFS	200	543 (1 FTE per Ranger District)	343	\$16,112,082.00
BLM	65	528 (1 FTE per 0.5 million acres)	463	\$21,748,962.00
<b>TOTAL</b>				<b>\$37,861,044.00</b>

### B. Recovery

We request that Congress fully fund FWS recovery plans for FY 2008 for plants and animals with High Recovery Potential and a High or Moderate degree of Threat, according to the FWS priority ranking system. For lower ranked species, we request that Priority 1 recovery actions identified in recovery plans be funded for FY 2008. Priority 1 actions are defined by FWS as *actions needed to prevent extinction*.

Recent scientific studies based on the FWS priority system and species status recommended an augmentation of \$300 million above current annual recovery spending. This augmentation would certainly improve recovery success under the ESA. Given current budget constraints, we request a recovery budget of at least \$100 million for the FY 08 FWS recovery program and that recovery funding be disbursed based on the system described above.

### C. Invasive Non-Native Species

Despite its urgency, there is no dedicated line item for invasive species management in either the BLM or USFS, not to mention FWS and other agencies. The absence of a line item interferes with both accountability and incentive for agencies and staff involved in invasives management. The USFS estimates that at least \$300 million is needed merely to contain infestations to existing areas. This funding level would not eradicate existing infestations – merely restrict them to current locations. We estimate that this amount would also be a minimum request for BLM lands. We request that Congress establish a budget line item for invasives management for each agency and fund each at the \$300 million level (\$600 million total). We further request that expenditures be prioritized first to protect areas that are currently uninfested, and second towards prevention, early detection and control of new or pioneer infestations.

**D. Native Plant Materials Development**

This program is funded in the Forest Service under the NFN3 line item. The president's budget allocated \$0 for this critical program. We recommend that both the BLM and Forest Service native plant materials line items be funded at \$5 million, for a total of \$10 million.

**E. Climate Change**

The first step to a response to climate change is an assessment of the threat. We recommend that the Congress create a new line item for climate change assessment and mitigation and allocate \$250,000 to each agency – BLM and USFS (\$500,000 total) – to (i) identify species and ecosystems at greatest risk from climate change and (ii) develop management plans to protect these species and habitats where possible.

We hope that you will take these proposals and issues into account as you formulate budgets for FY 2008 and beyond. Thank you for the opportunity to present this request.

Sincerely,



Emily B. Roberson, Ph.D.  
Director

**Native Plant Conservation Campaign Affiliate Organizations**

Arizona-Sonora Desert Museum	Lady Bird Johnson Wildflower Center	New Mexico Rare Plant Technical Council
Arizona Native Plant Society	Maryland Native Plant Society	North Carolina Botanical Garden
Arkansas Native Plant Society	Minnesota Native Plant Society	North Carolina Wild Flower Preservation Society
Botanic Gardens Conservation International (BGCI)	Missouri Native Plant Society	Oklahoma Native Plant Society
California Native Plant Society	Montana Native Plant Society	South Carolina Native Plant Society
California Oak Foundation*	Native Plant Society of New Jersey	Ticonderoga Arboretum and Botanical Gardens, VA
Colorado Native Plant Society	Native Plant Society of New Mexico	Utah Native Plant Society
Florida Native Plant Society	Native Plant Society of Northeastern Ohio	Virginia Native Plant Society
Grand Prairie Friends of Illinois	Native Plant Society of Oregon	Washington Native Plant Society
Herb Society of America	Native Plant Society of Texas*	West Virginia Native Plant Society
Idaho Native Plant Society	Native Prairies Association of Texas (NPAT)*	Wyoming Native Plant Society
Indiana Native Plant and Wildflower Society *	New England Wild Flower Society (NH, CT, RI, MA, ME, VT)	
Iowa Native Plant Society		
Kansas Native Plant Society		
Kauai Native Plant Society		