

Center
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Biological
Diversity



California
Native
Plant
Society



Native Plant Conservation Campaign

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Testimony of
Emily B. Roberson, Ph.D., Director
Native Plant Conservation Campaign
Regarding
the U.S. Fish and Wildlife Service Recovery Program, and the
Botany Programs of the USDA Forest Service and USDI Bureau of Land Management

March 25, 2003

The Native Plant Conservation Campaign (NPCC) is a nationwide network of native plant societies and other plant science and conservation organizations. The NPCC is a project of the Center for Biological Diversity and the California Native Plant Society. Our mission is to promote appreciation and conservation of native plant species and communities through collaboration, education, law, policy, land use and management. Currently the NPCC represents more than 57,000 laypersons and professional botanists in 28 states. NPCC members rely on the nation's public lands and botanical resources for enjoyment, education, research, and recreation. The NPCC requests that Congress augment the budget of the Bureau of Land Management (BLM) by \$20,069,792 and that of the U.S. Forest Service (USFS) by \$17,298,860 to adequately staff botany programs within these agencies. We further request an augmentation of \$100 million in the FWS recovery budget to begin to address the backlog in recovery plan implementation.

BACKGROUND

A. Land Management Agency Staffing

Americans treasure our public lands and natural heritage. These lands are central to our quality of life and to our economic well being. Because of the ubiquity of vegetation, botanists are among the most important resource managers on public lands, but federal land management agencies are severely understaffed in botany. Nationwide, the Bureau of Land Management (BLM) employs only 61 botanists to manage vegetation on its 264 million acres (1 botanist per 4 million acres). The U.S. Forest Service (USFS) employs 128 botanists across 191 million acres of National Forests (1 botanist per 1.5 million acres). This is a serious problem for a number of reasons.

First, plants are the foundations of ecosystems. Proper management of native vegetation is a primary factor determining the quality and quantity of goods, services and enjoyment that Americans derive from their public lands and other wildlands. Second, eagles, bears, salmon, and all native wildlife that the public enjoys require healthy, well-managed native plant communities for food, cover, and safe habitats to raise their young. Third, rare species conservation, timber harvest, recreation, energy

Promoting appreciation and conservation of native plant species and communities through collaboration, education, law, policy, land use and management

development, livestock management and other important programs all require input and review from qualified botanists to be successful and avoid inadvertent resource damage and unnecessary acrimony, administrative appeals and litigation. National Forest lands, for example, provide habitat for nearly 2,000 imperiled “sensitive” plants, any of which could become eligible for listing if mismanaged. Finally, the President’s priorities for public lands include increased emphasis on fire and invasive weed management to prevent further ecological degradation. Because both priorities focus on vegetation, botanists are integral to implementing them effectively. Clearly, current staffing levels are inadequate to meet the agencies’ duties to taxpayers or the needs of the public lands.

B. Recovery

Recovery of imperiled species, and their removal from the federal endangered species list is the primary goal of the Endangered Species Act (ESA), and the primary duty of the U.S. Fish and Wildlife Service (FWS) and other agencies charged with management and recovery of imperiled species and their habitats.

Unfortunately, recovery programs for plants are also severely underfunded and understaffed. Sixty-one percent of the organisms on the federal endangered species list are plants. However, according to the FWS in 1997, less than 4% of federal recovery funding went to listed plants. Thus, many plant recovery plans are not being adequately implemented; many are not implemented at all. Funding for plants must be increased if recovery goals are to be met. 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 recovery budgeting.

REQUEST

A. Land Management Agency Staffing

We request the following augmentations as 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.
- BLM office organization varies considerably from state to state. There are 156 BLM field offices, but areas of responsibility vary from several thousand to several million acres. Therefore our staffing recommendation is based on the number of acres managed. We propose that BLM employ one series 430 botanist for each 500,000 acres under management. Botanists should be distributed based on local workloads. At minimum each BLM field office should be staffed with one full time botanist.

Based on the current GS-11 Step 1 base salary with no locality adjustment (\$42,976/yr), these staff levels would require the following budget augmentations:

Agency	Current FTEs	FTE Goal	Needed	Additional Cost (vs. current budget)
USFS	128	543 (1 FTE per Ranger District)	415	\$17,835,040.00
BLM	61	528 (1 FTE per 0.5 million acres)	460	\$19,768,960.00
TOTAL				\$37,604,000.00

B. Recovery

We request that Congress fully fund FWS recovery plan FY 2004 budgets for all species (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 2004. Priority 1 actions are defined by FWS as actions needed to prevent extinction.

We do not have the FWS recovery budget requests for the species that fall into these categories. However, recent scientific studies (Miller et al., 2002; Restani and Marzluff, 2002) 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 preliminary augmentation of **\$100 million** over FY03 spending levels for the FY04 FWS recovery program.

We hope that you will take these proposals and issues into account as you formulate budgets for FY 2004 and beyond. Thank you for the opportunity to present this request.

Sincerely,



Emily B. Roberson, Ph.D.
Director

References

J. K. Miller, J. M. Scott, C. R. Miller, and L. P. Waits. 2002. The Endangered Species Act: Dollars and Sense? *BioScience* 52(2): 163.

M. Restani And J. M. Marzluff. 2002. Funding Extinction? Biological Needs and Political Realities in the Allocation of Resources to Endangered Species Recovery. *BioScience* 52(2): 196

**NATIVE PLANT CONSERVATION CAMPAIGN
Affiliate and Cooperating Organizations**

NPCC Affiliates	NPCC Cooperators
<p>Arizona-Sonora Desert Museum California Native Plant society Center for Biological Diversity Colorado Native Plant Society Florida Native Plant Society Grand Prarie Friends of Illinois Herb Society of America Idaho Native Plant Society Iowa Native Plant Society Kauai Native Plants Society Lady Bird Johnson Wildflower Center Maryland Native Plant Society Minnesota Native Plant Society Missouri Native Plant Society Montana Native Plant Society New England Wild Flower Society (6 states) New Mexico Rare Plant Technical Council North Carolina Wild Flower Preservation Society North Carolina Botanical Garden Native Plant Society of New Mexico Native Plant Society of Northeastern Ohio Native Plant Society of Oregon South Carolina Native Plants Society Ticonderoga Arboretum and Botanical Gardens, VA Utah Native Plant Society Virginia Native Plant Society Washington Native Plant Society West Virginia Native Plant Society</p>	<p>Botresearch USA CalFlora Database California Trout Center for Native Ecosystems Defenders of Wildlife Endangered Species Coalition Forest Service Employees for Environmental Ethics Pacific Rivers Council PlantaEuropa PlantLife, UK Public Employees for Environmental Responsibility T&E Inc. Xerces Society</p>