



Center
for
Biological
Diversity



California
Native
Plant
Society

Native Plant Conservation Campaign

c/o California Native Plant Society
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Testimony of
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Native Plant Conservation Campaign

Regarding

The 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, and Funding for Prevention and Control of Invasive Non-Native Species Infestations
March 31, 2004

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 29 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 \$15,815,168 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 and \$14.4 million for invasive non-native plant inventory and control.

BACKGROUND

A. Land Management Agency Staffing

Americans treasure our public lands. They are central to our quality of life and to our economic well being. Botanists are among the most important resource managers on public lands, but 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 4.3 million acres). The U.S. Forest Service (USFS) employs 175 botanists across 191 million acres of National Forests (1 botanist per 1.1 million acres). This is a serious problem for a number of reasons.

First, plants are the foundations of ecosystems. Management of native vegetation controls the quality and quantity of goods, services and enjoyment that Americans derive from their public lands. Second, eagles, salmon, and all native wildlife that the public enjoys require healthy native plant communities for survival. Third, species conservation, recreation, energy development, livestock management and other programs all require input and review from qualified botanists to avoid inadvertent resource damage and unnecessary controversy and litigation. National Forest lands, for example, provide habitat for nearly 2,000 "sensitive" plants, any of which could become eligible for federal listing if mismanaged. Finally, the President's priorities for public lands include increased emphasis on fire and invasive species management to prevent further ecological degradation. Both priorities focus on

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vegetation, thus botanists are integral to their implementation. 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 agencies charged with management and recovery of imperiled species and their habitats.

Unfortunately, plant recovery programs are severely underfunded and understaffed. Sixty percent of federal endangered species are plants. However, according to the FWS in FY 2000, only 4.5% of federal recovery funding went to listed plants. Thus, many plant recovery plans are not being adequately implemented; indeed many are not implemented at all. 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 cause up to \$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 listed plants). Invasive non-native plants (weeds) are among the most problematic invasive species on federal lands. According to the BLM, weed infestations are growing at a rate of 4,600 acres/day and already dominate at least 17 million acres of federal public lands. These infestations reduce the value of our public lands for recreation, wildlife, and livestock. They also often cause other problems such as reduced water supply or increased fire danger. It is imperative that agencies act aggressively to prevent and control invasive non-native species infestations. This requires adequate funding.

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. Their areas of responsibility vary from several thousand to several million acres. We propose that BLM nationwide 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 a 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	175	543 (1 FTE per Ranger District)	368	\$15,815,168.00
BLM	61	528 (1 FTE per 0.5 million acres)	467	\$20,069,792.00
TOTAL				\$35,884,960.00

B. Recovery

We request that Congress fully fund FWS recovery plan FY 2005 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 2005. 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 FY 03 spending levels for the FY 05 FWS recovery program.

C. Invasive non-native species

The BLM received \$7.7 million in FY 04 for control and inventory of invasive non-native plants nationwide. The agency estimates it requires approximately \$16 million to adequately meet needs for FY 05. That is a budget augmentation of **\$8.3 million**.

Region 5 of the USFS has estimated that an additional \$610,000/yr is needed to adequately meet regional weed control needs for FY 05. Based on the assumption that all 10 USFS regions need at least that amount, we request a budget augmentation of **\$6.1 million** for USFS non-native plant inventory and control programs service-wide.

Total FY 05 request for **BLM + Forest Service = \$14.4 million** over FY 04 budget

We hope that you will take these proposals and issues into account as you formulate budgets for FY 2005 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 Allocation of Resources to Endangered Species Recovery. *BioScience* 52(2): 196

NATIVE PLANT CONSERVATION CAMPAIGN
Affiliate and Cooperating Organizations

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