

# National Environmental Coalition on Invasive Species

Defenders of Wildlife, Environmental Defense, National Wildlife Federation, The Nature Conservancy, Union of Concerned Scientists

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Natural Resource Conservation Service  
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To whom it may concern:

The member organizations of the National Environmental Coalition on Invasive Species are writing to comment upon the interim final rule for the Grassland Reserve Program. *Separately*, our individual organizations have protected millions of acres of land; worked with thousands of corporate partners, landowners, affiliates, and community groups; and provided scientific, economic, and legal analyses that advocate responsible policy solutions at the international, national, and local level. *Together*, our organizations have over six million individual members and supporters. The threat that invasive species pose to our environment and economy and our interest in finding equitable, practical, and cost-effective solutions to this environmental problem unites us in this Coalition.

Invasive species that choke out, devour, and destroy native wildlife and their habitat have infested more than 100 million acres of the American landscape. An additional three million acres are lost each year to invasive weeds – an area equal to a strip of land two miles wide stretching from coast to coast. Invasive species are one of the most critical threats to America's natural diversity and pose clear risks to the nation's waters, forests, farmlands, rangelands, wetlands, natural areas, and public and private property values. Experts estimate that these fast moving invaders are already causing \$130 billion of damage each year to the economy.

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The interim final rule for the Grassland Reserve Program (GRP) is proposing to pay farmers and ranchers easement, rental, and cost-share payments to preserve grassland, protect grassland from conversion, support grazing, and maintain and improve plant and animal biodiversity. We have the following comments about the interim final rule:

## **ADDRESS INVASIVE SPECIES**

Nowhere in the rule is there any indication of how GRP will treat enrollment applications for a) rental or easement payments for grasslands that are dominated by invasive species, and b) cost-share payments that would involve planting or maintaining invasive species. Enrolling and maintaining acres filled with invasive plants could create a seed source for nearby areas and a headache for neighboring landowners. Further, NRCS might also find itself in the position of funding the maintenance of invasive species that NRCS or other agencies are spending resources

to eliminate or control elsewhere. Although “noxious” weeds are excluded from the proposed definition of “natural,” the federal noxious weed list is extremely limited. It includes only 72 terrestrial plants and not some of the worst weeds of grasslands. State noxious weed lists are often limited to agricultural weeds and omit species that can cause significant ecological damage.

**Suggestion:** This is an extremely important omission at the very least the program should emphasize enrollments of grasslands that are not dominated by invasive species and should not provide cost-share for maintenance of invasive species-dominated habitat or restoration with invasive plants. Preferably, NRCS would de-emphasize invasive species-dominated grasslands by revising its use and definition of the term “natural” as it applies to this program (see below).

### **RECONSIDER THE USE OF THE TERM “NATURAL”**

NRCS has made the case that some non-native grasslands can support significant biodiversity and that it may be extremely difficult to restore native-dominated grassland in some such habitat. However, the proposed definition of “natural” raises many problems, including the use of undefined terms such as “adapted” and “ecological site” and the inclusion of “native” which has already been described as distinct. Most significantly, as mentioned above, this definition implicitly allows enrollments of grasslands dominated by invasive species and maintenance of those species and allows restorations to seed with invasive species. We expect that this is not NRCS’s intention.

**Suggestion:** We believe that NRCS’s purposes in allowing enrollments of beneficial non-native grasslands would still be achieved by replacing “natural” with “naturalized” using the following definition: “naturalized means an introduced species that can perpetuate itself in the environment without cultural treatment. For the purposes of this part the term “naturalized” does not include any plant listed as “invasive or noxious” on USDA’s “PLANTS” database and species that the State Conservationist determines to be invasive or otherwise harmful.”

### **PRIORITIZE NATIVE GRASSLANDS**

NRCS clearly should give a preference for enrollments of native grasslands (or restorations to native grassland) because such habitats will nearly always better achieve Congress’ goal for the program of maintaining and improving plant and animal biodiversity.

**Suggestion:** The easiest way to create such a preference would be to simply change rule language under § 1415.8 so that states give preference to native grassland enrollments:

"(b) USDA, at the State level, with advice from the State Technical Committee, shall establish criteria to evaluate and rank applications for easement and rental agreement enrollment following the guidance established in paragraph (a) of this section.

(c) Ranking criteria will emphasize support for:

(i) Native [~~and natural~~] grassland, **and secondarily for naturalized grassland;**"

We hope that you will incorporate these comments into the final rule. We believe such changes will increase make the program an effective tool in checking the spread of invasive plants and

promoting America's biodiversity without compromising GRP's ability to reach and assist ranchers and other grassland landowners.

Sincerely,

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