May 1, 2015

Ms. Olivia Kwong  
Seeds of Success Webmaster  
Bureau of Land Management  
1849 C Street NW, Rm 2134LM  
Washington, D.C.  20240

Dear Ms. Kwong,

Western Governors appreciate that the Bureau of Land Management (BLM) has solicited their review and comment on the second draft National Seed Strategy for Rehabilitation and Restoration 2015-2020 (Strategy). We value this recognition of state expertise as you refine an interagency approach to seed supply and application strategies in land rehabilitation and restoration.

Western Governors are pleased that the revised draft Strategy incorporates changes in response to our prior comments. The new draft better defines states as a collaborator in creating a national network of seed reserves and storage facilities. The calls for increased research on biocontrol and bio-pesticide methods, as well as for their application to restoration efforts, are welcome additions. Furthermore, review and revision of the Strategy every five years will help drive adaptations in approach as new science becomes available and landscape conditions change.

The new action item 1.3.5 to identify and address deficiencies in seed procurement practices is a judicious addition. Action item 3.4.5 to use wildfire risk-based assessment tools to prioritize treatment locations also adds value to the restoration of lands impacted by wildfire.

Implementation plans for Secretarial Order 3336: Rangeland Fire Prevention, Management and Restoration call for using the National Seed Strategy to increase production, storage capacity, acquisition and use of genetically appropriate and locally adapted seed. Western Governors are responsible for ensuring that post-wildfire site stabilization and rehabilitation occur quickly and effectively. Increasing the availability of native seed for these activities is a laudable long-term goal, but there must also be adequate recognition in the Strategy that non-invasive, non-native seed may be needed to address immediate needs.
As mentioned in our previous comments, accurate projection of seed requirements is important to ensure adequate supply and price stability. We recommended using a 10-year planning horizon, but the revised Strategy continues to use a 5-year projection based on the 5-year life of the Plant Conservation Alliance (PCA) Memorandum of Understanding (MOU). The policy confines of the MOU should not override a scientifically-appropriate planning horizon. Western Governors maintain that a 10-year planning horizon is more suitable.

A handful of specific state agencies are mentioned as participants in action implementation, but the PCA should continue its outreach to states to ensure that more and diverse interests are represented and greater resources are available for achieving Strategy objectives.

A more cohesive federal interagency approach on seeding adds tremendous value for BLM, states and others working together on land restoration and rehabilitation. Western Governors support a unified strategy to meet our shared goal—healthy western landscapes.

Sincerely,

James D. Ogsbury
Executive Director

cc: Ed Roberson, Assistant Director, Resources and Planning, BLM
Peggy Olwell, Plant Conservation Program Lead, BLM