

Comments received by the CCBA during the validation audit.

CCB Standards Second Edition

Project: **Ducks Unlimited Avoided Grassland Conversion Project in the Prairie Pothole Region**

Comment 1

Date:

Sent by: Lloyd Jones, Refuge Coordinator, U.S. Fish and Wildlife Service

To Whom it May Concern:

The U.S. Fish and Wildlife Service (FWS) has responsibilities under the international Migratory Bird Treaty Act to preserve and protect habitats for migratory birds. The Prairie Pothole Region (PPR) is a critical region in providing strategic wetland and grassland breeding and migration habitat for a host of migratory birds, notably waterfowl. The FWS has invested over \$100 million in the PPR acquiring over 2.7 million acres of conservation easements to protect this important habitat. However, the additional habitat protection needed to sustain current levels and productivity of migratory birds in the PPR is identified as requiring additional protection on 1.4 million acres of wetland and 10 million acres of grassland. This Ducks Unlimited project creates an incentive based program to further protect grasslands in the PPR and is supported by the FWS to help meet these conservation goals. The Ducks Unlimited program is a "value added" component to the long-standing and successful efforts to date of the FWS's grassland conservation easement program.

*An element of consideration in habitat conservation in the PPR is the fact that grasslands are being converted to other uses, primarily cropland, at a rapid rate. High commodity prices, genetically modified crops that are adaptable to newly converted lands, a movement to large farm operations and equipment requiring more land conversion to justify expansion, a lack of security or safety net for cattle operations creating an incentive for grassland conversion and the safety net that does exist under the current Farm Bill for farming which reduces the risk to farm marginal lands, are examples which result in grassland being converted to cropland. The estimate of Ducks Unlimited of a 2-3 percent annual loss of grassland is supported by the best available information. The FWS however, feels that this rate of loss rate or "threat rate" may be conservative based on the increased number of inquiries to the FWS from landowners interested in selling conservation grassland easements. We currently have a "waiting list" of landowners exceeding 600 interested in an alternative offer to conversion. Many landowners are faced with the issues noted above and the conversion threat of grassland to cropland is clearly on the increase.

We would also point out that an ongoing rate of grassland loss has a compounding effect on the threat to the biological integrity of the grassland resource in the PPR. Each year the grassland habitat base is eroded further. Native prairie grassland is a finite resource, it cannot be restored and it is not being created. Once converted, the diverse flora ecological integrity is destroyed and cannot be re-created. Native grassland in the PPR is a resource of international significance because of the contribution to essential life cycle needs of migratory birds. Birds produced in the PPR, on the grasslands described in this Ducks Unlimited Project, are the birds that traverse the North American continent. There is no conservation threat anywhere in the world that surpasses the threat to native prairie grasslands in the PPR. Efforts to address this threat, such as the Ducks Unlimited Project, are essential for success in conservation. It is literally a race against time (conversion) and efforts such as this project are paramount to meeting this time need.

In terms of the surety and compliance of the grassland conservation easements that are secured in this project, the FWS has made a full and complete commitment to ensure the provisions of the easements are complied with. This conservation easement program was first authorized by Congress in 1958, with 2008 being the 50th anniversary of the program. From the beginning to now 50 years later, to the continuing implementation of this conservation effort with the identified goals, compliance has always been a top priority of the program. A recent Government Accounting Office review of the compliance aspect of the conservation easement program resulted in a conclusion of effective application. The FWS for example, has 33 trained law enforcement officers that commit 6 man years of time in North and South Dakota alone, for annual monitoring of every individual easement. This type of commitment ensures a compliance rate of approximately 99 percent with only occasional and minor infractions that are quickly addressed. The total cost associated with all aspects of monitoring and compliance is approximately \$1 million per year. With the current and ongoing investment to conservation of habitats in the PPR, an investment in monitoring and compliance at this level is justified and is provided by the FWS. The conservation easements secured through this Ducks Unlimited program would receive this level of commitment from the FWS.

Thank you for the opportunity to provide comments on this important program. Feel free to contact us if we can provide any additional information.

Comment 2

Date:

Sent by: Randy Kreil, Chief, Wildlife Division

On behalf of the North Dakota Game and Fish Department we would like to take this opportunity to provide comments on Ducks Unlimited's Avoided Grassland Conversion Project in the Prairie Pothole Region. We wholeheartedly support the efforts of Ducks Unlimited and this forward thinking and innovative project. A critical issue for our department is the loss of native prairie habitats to agricultural conversion. Every acre of native prairie lost means a loss in biological diversity that can never be replaced. Lost in our nation's efforts to preserve vanishing natural areas such as the Florida Everglades, Pacific Coast old growth forests, and the Arctic habitats of Alaska is the fact the most threatened of our natural areas is the grasslands of the Great Plains. Agricultural advances, wind power, coal mines, oil and gas development and urbanization all are putting incredible pressure on this biologically rich and diverse habitat. This project combines permanent protection of these areas with the next generation of conservation – carbon emissions management. Ducks Unlimited has always been a leader in conservation and in seeking out new and more effective ways to accomplish the mission of habitat and natural resource conservation. This project is evidence of that commitment and we encourage you to support their efforts. Thank you for the opportunity to provide comments.

Comment 3

Date:

Sent by: Mark Liebig, Research Soil Scientist, USDA-ARS

Comments are listed by page number.

P.14. There may be value in adding a paragraph within the 'Peer Reviewed Literature' section regarding measured C change under native rangeland (as measured by Al Frank from 1996 to 2001; see reference appended below). Dr. Frank observed a CO₂-C accrual rate of 0.3 Mg/ha/yr. It's difficult to tell if this accrual rate can be maintained under projected climate change for the region, but it at least lends evidence that there's an inherent C buffer for native range (as opposed to just maintaining SOC stocks). Furthermore, the CCX rangelands offset committee has assigned a C accrual rate for native range within the CMT/CMD of 0.08 Mg C/ha/yr or 0.16 Mg C/ha/yr (depending on management; see www.chicagoclimateexchange.com for details). These are conservative rates, but again, there's evidence that SOC accrues under native range within the project region.

P.15. While there's adequate SOC stock data in Table 1 for the CTM, Liebig et al. (2006) observed a range of 82.1 to 93.3 Mg C/ha (0-30 cm) for native range sites near Mandan (reference appended below).

P.24. There may be value in using a more conservative Fmg factor in the IPCC stock change assessment. It is doubtful producers would use full tillage (Fmg=1) throughout the entire project region, particularly in northwest ND where drier conditions warrant the use of no-till for successful crop production. Though the change is minor, please consider using reduced tillage Fmg factors of 1.02 (temperate, dry) and 1.08 (temperate, moist).

Frank, A.B., 2004. Six years of CO₂ flux measurements for moderately grazed mixed-grass prairie. *Environ. Manage.* 33 (S1), S426-S431.

Liebig, M.A., J.R. Gross, S.L. Kronberg, J.D. Hanson, A.B. Frank, and R.L. Phillips. 2006. Soil response to long-term grazing in the northern Great Plains of North America. *Agric. Ecosys. Environ.* 115:270-276.

Comment 4

Date:

Sent by: Barry Botnen, Research Scientist, Energy & Environmental Research Center

I am commenting on the Ducks Unlimited (DU) Avoided Grassland Conversion Project in the Prairie Pothole Region. DU is a partner in the Plains CO₂ Reduction (PCOR) Partnership. The PCOR Partnership is one of seven U.S. Department of Energy (DOE) National Technology Laboratory (NETL) Regional Carbon Sequestration Partnerships (RCSPs). The PCOR Partnership region includes all or part of nine states and four Canadian provinces and is managed by the Energy & Environmental Research Center (EERC) at the University of North Dakota (UND) in Grand Forks, North Dakota. Through the fall of 2009, the PCOR Partnership has been developing and conducting a terrestrial field validation test that is designed to develop the expertise, real-world experience, and business models needed to implement full-scale, long-term terrestrial CO₂ sequestration. This will, in turn, result in greenhouse gas reductions and salable carbon offsets. DU has done a wonderful job addressing issues not only pertaining to carbon retention in native prairie, but also the importance of biodiversity and the values of the many co-benefits that this program will protect. This project truly has no downside, DU follows its mission of protecting habitat in the Prairie Pothole Region of the United States, and at the same time global climate change issues are addressed. This document provides a great level of detail and a sound scientific foundation for this project.

Comment 5

Date: 12 December 2008

Sent by: Neal Niemuth, Habitat and Population Evaluation Team, U.S. Fish and Wildlife Service

I was asked by staff at the Northern Great Plains Office of Ducks Unlimited to comment on their avoided grassland conversion project for the U.S. Prairie Pothole Region. In my opinion the document accurately portrays conditions and threats to grasslands, wetlands, and biodiversity in the Prairie Pothole Region. If anything, the document understates the importance of the Prairie Pothole Region to wildlife. The Prairie Pothole Region not only has high species richness for grassland birds, wetland birds, and shorebirds, but supports large proportions of the continental populations of many of these species. The low human density in the region along with high interest in conservation easements and an established conservation mechanism (i.e., the USFWS easement program) makes the Prairie Pothole Region an efficient, cost-effective place for conservation action.

Please feel free to contact me if I can assist with any questions regarding wildlife in the Prairie Pothole Region, and thank you for considering Ducks Unlimited's proposal.

Comment 6

Date:

Sent by: Keith Trego, Executive Director, ND Natural Resources Trust

I'd like to add my voice to what I assume will be overwhelming support for the land protection and green house gas (GHG) reduction project undertaken by Ducks Unlimited (DU) in the Prairie Pothole Region of North and South Dakota. DU's work is both innovative and timely, responding simultaneously to the world wide threat posed by uncontrolled GHG emissions and the threat of native prairie conversion brought about by unregulated land use and unprecedented speculation in the agriculture commodity markets.

DU's efforts capture both a contribution to a world wide environmental need as well as an environmental and economic opportunity for farmers and ranchers in the Dakotas. Combining long term land protection (permanent easement) payments through their partnership with the US Fish and Wildlife Service (USFSW) with one-time GHG purchase payments ensures both native prairie protection as well as economical capture of potential GHG emissions. The combination of these environmental and business activities creates an efficient approach to native prairie protection and world wide climate change.

The economic incentive created by the DU program assists agricultural producers and the communities in which they reside and participate by adding to both the cash flow of the community and sound land use that creates a sustainable agricultural base. Further, the program goes to the heart of the need to protect every acre of native grassland that remains in the Dakotas. Not only does retention of native grassland benefit untold resident and migratory wildlife species and combat dangerous world wide climate change, but the resulting long term grassland agriculture that emanates from it also provides long term economic stability for small communities throughout the region. DU's Avoided Grassland Conversion Project in the Prairie Pothole Region is the most strategic, forward thinking approach combining land use protection and GHG reduction needs yet devised. Its certification would be a mutual benefit to both DU and to CCBS.

Thank you for consideration of my comments.

Comment 7

Date:

Sent by: Casey Stemler, PPJV Coordinator

Dear Community, Climate and Biodiversity Alliance:

It has come to my attention that Ducks Unlimited, Eco Products Fund, and other affiliated entities have prepared and submitted their "Avoided Grassland Conversion Project in the Prairie Pothole Region" for certification under the Climate, Community, and Biodiversity Standard.

As an introduction, there are some 20 federally recognized migratory bird joint ventures that cover the United States of America and I serve as the Coordinator for the Prairie Pothole Joint Venture (PPJV). The PPJV encompasses parts of Montana, North Dakota, South Dakota, Minnesota, and Iowa and is served by a Management Board of high-level members from the respective states, nongovernmental organizations, and Federal agencies (including representatives from Washington, DC). The PPJV is one of the longest standing joint ventures and is widely recognized as one of the most scientifically advanced. Our mission is to implement conservation programs that sustain populations of waterfowl, shorebirds, other waterbirds and prairie landbirds at objective levels through targeted wetland and grassland protection, restoration and enhancement programs. The prairie pothole region (of which PPJV covers the U.S. portion) is internationally known as the "Duck Factory" and its importance to other grassland and wetland dependent nesting birds is well known. The boundaries of our joint venture encompass one of the most threatened ecosystems (prairie grasslands) in the country and our goal is to protect 10.4 million acres of grasslands and 1.4 million wetland acres. We arrived at these habitat goals using robust data sets and sophisticated models to calculate the amount of habitat necessary to support specific bird population objectives.

Unfortunately, our ability to make substantial gains toward our habitat goals is less than desired due to lack of funding and more disturbing, the continued loss of native prairie habitat.

The report aptly notes, "public policies and demand for food and fiber are the primary economic drivers that make it increasingly attractive for landowners in the Project Area to cultivate native grassland.....The U.S. Federal Government's strong push for biofuels policies is a driver of grassland conversion into cropland." Our general observations and analyzed data show that we are losing native prairie across the landscape. Sadly, according to the report, model-based predictions suggest that 73% of native prairie grassland in existence today will be lost in the next 99 years - unless we can continue our efforts. The authors of the report, and myself included, certainly recognize and respect the rights of each individual landowner. It is from this perspective that I comprehend the multiplicity of benefits from the "Avoided Grassland Conversion Project" and therefore believe it is worthy of your consideration - the easements discussed in the report are completely voluntary; they provide the landowner with multiple options for their lands, including an important source of revenue; the easements help provide the migratory bird habitat that my Joint Venture is ultimately trying to conserve; and the overall benefit to the environment is reduced CO2 emissions.

I briefly touched on the benefits of the Project Area to migratory birds, however I would like to expand my comments on this subject. Unfortunately, I can not speak to the overall biodiversity of the prairie landscape beyond birds as that is not my area of expertise. The PPJV is committed to the implementation of four internationally recognized bird plans and those plans are as follows: The North American Waterfowl Management Plan (NAWMP), Partners in Flight (PIF), The U.S. Shorebird Conservation Plan, and the North American Waterbird Conservation Plan. As the report correctly states, the NAWMP recognizes the prairie pothole breeding habitat as its top priority for protection (this includes both U.S. and Canada), so I commend the effort of this project to secure much needed nesting habitat in this region. The report continues by discussing the importance of this region to a number of high priority species of concern, including Baird's

sparrows, Nelson's sharp-tailed sparrows, and Sprague pipits. These species utilize large blocks of undisturbed grassland habitat and as this project continues toward fulfilling its goals the habitat they secure will certainly benefit bird populations. Shorebirds use this region for both nesting and migration and as the report notes, a number of shorebird species nest in a landscape of wetlands and grassland. In addition, the productivity of the wetlands are vital to the millions of shorebirds that migrate through this area. As a result, the protection of native prairie will provide the necessary nesting cover for these birds and help protect wetlands from sedimentation and other forms of degradation. Lastly, I will speak to the "Management Capacity" section of the report and the overall approach of Ducks Unlimited on the landscape. In various capacities, I have worked with Ducks Unlimited over the years and have found their organization to be visionary, innovative, and responsible. The project under your review is no exception. As an organization, their primary focus is on waterfowl, however they recognize - through research - that wetlands and grasslands benefit a host of species beyond waterfowl. Moreover, they recognize - through research - that maintaining native prairie helps to sustain biodiversity, yet also captures climate altering gases. As noted earlier, the PPJV is often mentioned in the context of its scientific abilities and landscape planning tools. The Ducks Unlimited staff stationed in Bismarck, ND contribute significantly to the scientific ability and credibility of the PPJV. As noted in the report, they invest the time, money, or human resources to conduct the necessary research to better inform land management decisions. Consequently, I hold a high level of confidence in their CO2 reduction estimates, because of my past experience working with their scientists. Further, the report notes that, "Ducks Unlimited is a community-oriented organization and works across the entire community to deliver conservation outcomes and benefits." Based on my experience I find this to be an accurate statement. I suspect securing 26,300 acres of grassland easements is only the beginning. Ducks Unlimited and other partners involved in this program have the knowledge and ability to further grow the footprint of conservation. And finally, the report discusses the presence and activities of the United States Fish and Wildlife Service (FWS) in the Project Area, therefore I will not go into any length of detail in my comments on this particular topic. Nonetheless, I will note that the FWS has a large financial investment and presence through their ongoing easement program in the Dakotas, so they annually fly their easements to ensure ongoing compliance. As a result, the easement program has considerable oversight and strong assurance of compliance (or mitigation should a violation be identified).

In closing, this report is well written and to my knowledge biologically correct. The growth of this program is very important to our continuing efforts to secure the habitat needed by nesting and migrating birds. Moreover, it is these same habitats that can help, at least in some way, our country reduce its carbon footprint. Please give the report your full consideration.

Comment 8

Date:

Sent by: Genevieve Thompson, Vice President Executive Director, Audubon Dakota

Thank you for the opportunity to provide input into the Ducks Unlimited Avoided Grassland Conversion Project in the Prairie Pothole Region. I am pleased to be able to provide positive input into the importance of this undertaking, and to briefly review the multiple benefits that result from their undertaking.

Audubon's mission is to conserve and restore natural ecosystems, with a focus on birds and their habitats, to benefit biological diversity. In the Northern Great Plains, that involves a primary focus on the grassland- and wetland-dependent birds, and the protection of the prairie ecosystem upon which these species depend. Ducks Unlimited's Avoided Grassland Conversion Project brings significant and measurable benefit to the protection of this vital ecosystem, by offering the private landowners who are the stewards of 90% of the grassland ecosystem in the Dakotas with the opportunity for remuneration to protect this resource.

The innovative program that Ducks Unlimited is implementing offers an alternative for private landowners to the increasing threats posed by agricultural conversion and the loss of native prairies, exacerbated more recently by increasing demand for crop-based biofuels and the concomitant escalation of land and commodity prices. There is an added social dimension to the Grassland Conversion Project delivered by Ducks Unlimited and its partners. Providing economic incentives to maintain, protect and restore native prairie stabilizes the small communities that populate a significant percentage of our rural states, and increases the likelihood that these private landowners will continue to make a living by protecting native grasslands.

The native grasslands and wetlands of the Prairie Pothole Region are home to an amazing diversity of bird species, many of which are threatened with significant decline. Grassland species such as the Baird's Sparrow, Grasshopper Sparrow, Chestnut Collared Longspur and too many others are declining to the point where they have been included on Audubon's Watchlist and on the North Dakota State Level I List of Species of Conservation Concern. Ducks Unlimited's Avoided Grassland Conversion Project will contribute significantly to the permanent protection of habitat vital to these declining species.

Finally, the contribution of this project to the daunting issue of climate change that confronts us bears mention. The native grasslands of the Northern Great Plains have a significant propensity to sequester carbon, and Ducks Unlimited's project ensures that this will be perpetuated in the acres included within their project. By providing these grasslands with permanent easements, the "champagne cork" of carbon release that results when native prairies are turned over will be avoided in perpetuity.

Thank you for the opportunity to provide input. Please don't hesitate to contact me if I can provide additional information and/or clarification. And all the best in your important undertaking.
