

Jeff Ruch

From: McCall, Kevin - NRCS, Fort Dodge, IA
Sent: Wednesday, January 08, 2014 9:36 AM
To: Cronin, James - NRCS, Des Moines, IA; Anderson, Jennifer - NRCS, Athens, GA; Adkins, Martin - NRCS, Des Moines, IA
Cc: Beeler, Larry - NRCS, Des Moines, IA
Subject: RE: Widespread insecticide contamination of prairie wetlands

Before we drop everything, overhaul the CPA-52, call the national office, summon up all of the USDA biologist in America and turn this into an international incident lets go back and look at Marty's original note. I think Marty was only interested in making sure that we stay aware of this potential issue and what impacts these "Neonics" may or may not have on our WRP sites.

The first question I think we would need to answer is this an even an issue for our wetlands?

The second question is it even possible to mitigate. Do we know what practices or activities, will for sure, have a positive impact on the issue.

As I read the attached article it appears that the Neonics are being brought in to existing wetlands with water movement, and for us to have an impact on that may require management changes outside the easement area. If we do not know that we have a problem and/or we do know if the know that mitigation efforts will improve the problem, I would resist rushing to add this to our mitigation efforts.

I do agree with Jennifer on the point that our field offices have a very poor understanding of some of these environmental impacts, and agree that it has been a hole in our training. We may need to look at that issue and it may be better to attack it from a planning standpoint. We may need to build a better awareness for our field folks.

Kevin McCall

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From: Cronin, James - NRCS, Des Moines, IA
Sent: Tuesday, January 07, 2014 4:18 PM
To: Anderson, Jennifer - NRCS, Des Moines, IA; Adkins, Martin - NRCS, Des Moines, IA
Cc: McCall, Kevin - NRCS, Fort Dodge, IA
Subject: RE: Widespread insecticide contamination of prairie wetlands
Importance: High

Jennifer,

BOTTOM-LINE-UP-FRONT: All federal agencies must employ a systematic, interdisciplinary approach to their planning and decision-making processes, which may have an impact on the human environment. Furthermore, the courts have decided that federal agencies cannot simply adopt product labels or EPA product registration documents to short-cut their responsibilities because the analyses involved in registration, evaluation, and product labeling are inadequate to fully assess all federal actions under NEPA. NHQ should take the lead in developing the appropriate risk assessments, as

our current guidance (CPA-52 full version) is insufficient to properly assess human and ecosystem risks associated with agrichemical applications.

So my short answer to your question is yes, but training on the subject won't happen anytime soon unless NRCS has moved on this subject. Clearly, we are legally obligated to conduct all appropriate environmental assessments prior to taking an "action." EPA has taken the lead in developing human health and ecological risk assessments (<http://www.epa.gov/risk/>). This is what you refer to below, right? A little closer to home, I encourage everyone copied on this email to go to the following USDA/FS link that—I believe—gets at the heart of this subject: <http://www.fs.fed.us/foresthealth/pesticide/risk.shtml>

After reading this information and evaluating our CPA-52 and guide sheets, it's appears that NRCS has glossed over this subject for some reason: something that lawsuits forced the Forest Service to address.

To be fair, I believe the "Wetlands" guide sheet allows for the assessment of any impact related to the use of chemicals associated with the action under review. The "Wetlands" fact sheet addresses pollution, but only from the standpoint of a CAFO (point source)—this may mislead the field if the examples provided are taken as exhaustive. The wetlands guide or fact sheets do not mention pesticides. Also, the "Resource Considerations, Field Inventory Guide Sheet" allows for the assessment of water-resource concerns (look under water quality degradation where there is a box for "Pesticides transported to surface and ground waters.") Of course, this guide sheet is optional and is intended for the early phases in our planning process: a factor which may divert attention away from appropriate NEPA analysis and documentation later on.

The Forest Services' lessons and risk assessments should be explored further to ensure compliance with our obligations. **However, I think this is too big for Iowa to handle at present funding and staffing levels.** Therefore, given its national applicability, NHQ should be notified of this issue and asked to develop proper guidance on how to proceed.

Marty, I can approach NHQ or other appropriate level. Please advise.

Thanks,
James

From: Anderson, Jennifer - NRCS, Des Moines, IA
Sent: Tuesday, January 07, 2014 1:42 PM
To: Cronin, James - NRCS, Des Moines, IA; Adkins, Martin - NRCS, Des Moines, IA
Cc: McCall, Kevin - NRCS, Fort Dodge, IA
Subject: RE: Widespread insecticide contamination of prairie wetlands

I'd like to provide a recent, relevant example so helping Field Staff through these issues is in the forefront of our minds....

On Friday, I asked a DC to add a statement c/o no use of fertilizer, insecticide, fungicide, or residual herbicide to a WRP compatible use request for cropping brome with round-up ready soybeans prior to a native planting next fall. The DC was a bit frustrated and explained that IA NRCS won't pay to crop the area and the only way to get the landowner to do so is to let them make a profit off the beans, which may require treatment for aphids. This is a very valid point.

Considering cropping in this instance is a necessary restoration practice, I question whether NRCS is taking the right approach; a WRP restoration/management related topic for another discussion at a later time. Relating to the message string at hand, the crop will drain into the wetland portion of the easement and the DC wasn't able to envision the

cascading ecological effects that may result. Ecological response planning is a gap in the conservation planning process that needs to be addressed. Can we provide adequate training to field staff so they understand the resource risks and can make informed decisions in both agronomic and non-agronomic settings?

Jennifer Anderson-Cruz
Acting Area 2 Easement Specialist

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"Why should a botanist study land snails, obviously a part of the zoologist's grist, and why should he multiply his sins by extending these studies into the geological field? The answer is that in the solution of all problems, and particularly those of a scientific nature, we should make use of all available evidence no matter what the label of the branch under which it technically falls." Bohumil Shimek, 1930.

From: Cronin, James - NRCS, Des Moines, IA
Sent: Tuesday, January 07, 2014 8:27 AM
To: Adkins, Martin - NRCS, Des Moines, IA; Anderson, Jennifer - NRCS, Des Moines, IA
Cc: McCall, Kevin - NRCS, Fort Dodge, IA
Subject: RE: Widespread insecticide contamination of prairie wetlands

Ready to engage.

From: Adkins, Martin - NRCS, Des Moines, IA
Sent: Tuesday, January 07, 2014 8:25 AM
To: Cronin, James - NRCS, Des Moines, IA; Anderson, Jennifer - NRCS, Des Moines, IA
Cc: McCall, Kevin - NRCS, Fort Dodge, IA
Subject: FW: Widespread insecticide contamination of prairie wetlands

Please see the following email chain. I want you two to be in the loop on this conversation.

I'm going to initiate a conversation on this with Matt O'Neal and maybe others at ISU. James, let's plan to chat about this later this week.

Marty

From: Adkins, Martin - NRCS, Des Moines, IA
Sent: Tuesday, January 07, 2014 8:19 AM
To: Larry Beeler (Larry.Beeler@ia.usda.gov)
Cc: Mar, Jay - NRCS, Des Moines, IA
Subject: FW: Widespread insecticide contamination of prairie wetlands

Larry –

I'm forwarding this for your information. Here's the nickel version from my perspective: The use of neonicotinoid insecticides has grown rapidly in recent years. These compounds are very toxic (one gram can kill 80,000 bees); the question is how mobile and long-lived they are. The answer to that question has implications for wetland food chains and the Canadian study cited in the linked article isn't encouraging (fewer bugs = fewer birds and other animals).

Mace Vaughn is a pollinator specialist that is providing technical support on pollinator health and safety to the NRCS under a MOU with the Xerces Society. He's a very sharp guy and has written a tech note on how to evaluate/alter conservation practice standards to better protect pollinators.

It may be that wetland restoration and/or management plans might need to mitigate for insecticide movement if this is really a problem here. I plan to follow up on this question with Mr. Vaughn and with Matt O'Neil, an entomologist at Iowa State. I'll keep you posted.

Marty

From: Adkins, Martin - NRCS, Des Moines, IA
Sent: Tuesday, January 07, 2014 7:58 AM
To: 'Mace Vaughan'
Subject: RE: Widespread insecticide contamination of prairie wetlands

Mace –

It's good to hear from you. I saw this article yesterday and was troubled by the implications. What do you think? Specifically, are there things we should be doing to mitigate impacts on wetland food chains?

Marty

From: Mace Vaughan [<mailto:mace@xerces.org>]
Sent: Monday, January 06, 2014 7:00 PM
To: Adkins, Martin - NRCS, Des Moines, IA
Subject: FW: Widespread insecticide contamination of prairie wetlands

Hi Marty,

I hope that things are going well in Iowa. This article has been making the rounds and I wanted to make sure you were in the loop.

Best,
Mace

Mace Vaughan

Pollinator Program Director
The Xerces Society for Invertebrate Conservation
Joint Pollinator Conservation Specialist
USDA-NRCS West National Technology Support Center

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Find all the information you need to conserve pollinator habitat at: www.xerces.org/pollinator-resource-center/

Buy our best-selling book: [*Attracting Native Pollinators: Protecting North America's Bees and Butterflies*](#)

The Xerces Society for Invertebrate Conservation is an international nonprofit organization that protects wildlife through the conservation of invertebrates and their habitat. To join the Society, make a contribution, or read about our work, please visit www.xerces.org/

From: Hohman, William - NRCS, Fort Worth, TX [<mailto:William.Hohman@ftw.usda.gov>]
Sent: Monday, January 06, 2014 8:34 AM
To: 'Mace Vaughan' (mace@xerces.org) (mace@xerces.org); Eric Mader (eric@xerces.org); Vaughan, Mace - NRCS, Portland, OR
Subject: Widespread insecticide contamination of prairie wetlands

Mace and Eric, FYI. Bill

From: Jim [<mailto:duckwing9@gmail.com>]
Sent: Monday, January 06, 2014 9:38 AM
To: Alan D Afton
Subject: Widespread insecticide contamination of prairie wetlands

Al, this should be of interest to members of your list server.

Since around 2001, many crops including virtually all canola, corn, and soybeans (in the US and Canada) have been seeded with a insecticidal seed treatment (one of the neonicotinoids: imidacloprid, clothianidin, or thiamethoxam). These are highly mobile compounds and most of the active ingredient remains in the soil where it moves into groundwater and surface waters. The link below from CBC Saskatoon this morning reports on important research that began out of the University of Saskatchewan in 2012 focused on documenting prairie wetland contamination by the neonics. It is not surprising that these compounds are turning up in prairie wetlands at concerning concentrations.

<http://www.cbc.ca/news/canada/saskatchewan/pesticide-contaminating-prairie-wetlands-scientist-1.2482082>

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