



**DEPARTMENT OF THE ARMY**  
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CELRL-OP

25 FEB 2016

MEMORANDUM THRU: Tracey L. Keel, Chief, Technical Support  
Branch  
*TLK 2/25/16*

FOR: Eugene A. Dowell, Chief, Operations Division

SUBJECT: Mowing for Pollinators Standard Operating Procedure

1. Request approval to implement the Mowing for Pollinators Standard Operating Procedure (attached). This procedure is applicable at all Civil Works projects under management of Operations Division, Louisville District.
2. Implementation of these mowing procedures will aid in meeting the guidelines set forth in the *National Strategy to Promote the Health of Honey Bees and Other Pollinators* document.
3. The point of contact for this action is Keith Chasteen, Natural Resources Management Specialist, Technical Support Section, (502)315-6724.

*Eugene A. Dowell*  
EUGENE A. DOWELL  
Chief, Operations Division

Mowing for Pollinators  
Standard Operating Procedures  
Louisville District  
Operations Division

Background

Declining pollinator populations are a concern across the entire United States and beyond. On May 19, 2015, the *National Strategy to Promote the Health of Honey Bees and Other Pollinators* (Strategy) was released with the overarching goals of reducing honey bee colony losses, increasing the Eastern population of the monarch butterfly and restoring or enhancing 7 million acres of land for pollinators over the next five years.

This Strategy established guidance to promote the health of pollinator species on lands and waters administered by the U.S. Army Corps of Engineers. Specifically, it indicated that the Corps will:

- Identify existing policy and guidance, and modify for pollinator health including access for commercial hives.
- Incorporate pollinator work within budget guidance.
- Increase awareness and education.
- Implement conservation and best management practices for pollinator health.

This “Mowing for Pollinators SOP” is intended to help implement conservation and best management practices for pollinator health by reducing direct negative impacts on pollinator populations, improving and enhancing habitat, and by proactively managing mowed lands with promotion of pollinators in mind.

Applicability

As indicated in ER 1130-2-540 within the Introduction of Chapter 1 under Policy,

*It is Corps policy to apply principles of good environmental stewardship to the natural and cultural resources occurring on Corps administered and/or managed lands and waters. For the Corps the term “Steward” shall mean manager of those public resources. Environmental stewardship shall include both passive and proactive management to sustain healthy ecosystems and biodiversity, and conserve natural resources, such that Corps lands and waters are left in a condition equal to or better than their condition when acquired, and such that those natural and cultural resources are available to serve the needs of present and future generations.*

Additionally, the applicability of ER 1130-2-540 is indicated as,

*This regulation applies to all USACE commands having responsibility for civil works functions.*

Therefore, environmental stewardship of Corps lands applies to all Operations projects, including flood control projects, navigation projects and wildlife conservation areas. Implementation of the Strategy for pollinators is part of the environmental stewardship program.

### Standard Mowing Practices

Projects should assess their mowed lands in order to determine the best practices for those lands. As an example, project lands that have historically been mowed might better serve the natural resources of the project by converting those lands to forested, shrub or other types of habitat. Areas that must remain in a non-woody state for purposes of project operations and maintenance should be considered for management practices that will improve or enhance pollinator habitat.

Standard mowing practices to enhance pollinator habitat should adhere to the following:

1. Mow no more than 1/3 of the total area at any given time.
2. Leave at least 1/3 of area un-mowed as overwintering habitat.
3. During growing season, mow between July 1 and July 25.
4. During non-growing season, mow beginning late October and prior to March 15.

A preferred alternative to mowing would be to prescribed burn each section every two to four years. However, this will only be done in accordance with ER/EP 1130-2-540, Chapter 8. All plans must be in place, all participants must be fully qualified, all local permits must be obtained and all other requirements must be met prior to implementing a prescribed burn.

### Deviations from Standard Practices

Situations may exist that necessitate deviating from the above mowing practices due to project operation needs, changes in management emphasis, or for other reasons. Additionally, regular mowing should continue where required for other purposes, such as to maintain forested edge, along fence lines, to maintain manicured lawns within recreation and administrative areas, etc. The Standard Mowing Practices recommendations are only a guide and other deviations may occur due to labor availability and other reasons. However, the goal should be to manage within the guidelines and timing indicated in order to best meet the guidance of the Strategy.

### Habitat Enhancement

Increasing plant diversity on lands being managed for pollinators should be implemented as a way to increase nectar and larval host species. This is especially important for lands which currently do not contain plant species that are beneficial to pollinators. In this case, complete conversions from turf and pasture species to native pollinator species should be considered and appropriately planned for through the budgeting process. Partnerships can speed this process up if willing parties exist.

For lands that already have some plant species that are beneficial to pollinators, species diversity can be improved by inter-planting other nectar and larval host species. The goal of these plantings should be to provide nectar and larval host plants during the times of the season when

they are needed most, such as to provide flowering nectar plants when monarch butterflies are migrating through the area and are utilizing these plants.

Additional management practices should be used in order to improve existing and enhanced pollinator habitat. Suppression of invasive, non-native species, should be considered and budgeted for. Contracted “spot spraying” within established pollinator habitats can be effective for managing noxious and non-target plant species. For maintaining meadow habitats, woody species (trees, brush) may require herbicide treatments in order to suppress colonizer species when mowing frequencies are not successful in setting back these plants.

Pesticide applications, including herbicides, must adhere to the requirements indicated in ER/EP 1130-2-540, Chapter 3. Applications must be done in such a way as to not have a negative impact on pollinators.

Alternatives to herbicide applications should be considered, such as annual high mowing (8 – 10 inches high) until establishment of native species. Annual high mowing may be satisfactory for suppressing non-native species while allowing newly planted native species to become dominant within the area when completed prior to non-native seed production. Proper timing is essential and once established, native species should dominate the site eliminating the need for annual mowing.