

National Capital Planning Commission Meeting
May 7, 2026

Pentagon Commercial Vehicle Inspection Facility
NCPC File Number: 8741

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Services
Installation: Pentagon Reservation

On January 4, 2024, NCPC staff issued its [Pollinator Best Practices Resource Guide \(NCPC File Number 8510\)](#) (Reference 1). The Guide summarizes information in federal documents and other sources that support the restoration of falling populations of honeybees, monarch butterflies, and other pollinators.

Page 28 in the applicant's [submission materials](#) contains the project's proposed landscape schedule. Several entries and omissions in the schedule are not consistent with the NCPC Guide's recommendations. These include:

Milkweeds

On June 20, 2014, President Barack Obama issued a presidential memorandum entitled "Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators" (Reference 2). The memorandum established a Pollinator Health Task Force, to be co-chaired by the Secretary of Agriculture and the Administrator of the Environmental Protection Agency, and stated: "*The number of migrating Monarch butterflies sank to the lowest recorded population level in 2013–14, and there is an imminent risk of failed migration.*"

In May 2015, the Pollinator Health Task Force issued a "National Strategy to Promote the Health of Honey Bees and Other Pollinators" (Reference 3). The strategy laid out federal actions to achieve three goals, one of which was:

"Monarch Butterflies: Increase the Eastern population of the monarch butterfly to 225 million butterflies occupying an area of approximately 15

acres (6 hectares) in the overwintering grounds in Mexico, through domestic/international actions and public-private partnerships, by 2020.”

Common Milkweed (*Asclepias syriaca*)

Monarch butterfly caterpillars feed only on milkweeds. The NCPC Guide states on page 5: *“There are over 100 different species of milkweeds that are considered native to North America, one of which stands out - *Asclepias syriaca*, or common milkweed. According to the U.S. Forest Service, Common milkweed is, “...among the most important food plants for Monarch caterpillars,” and, “Nature’s mega food market for insects. Over 450 insects are known to feed on some portion of the plant. Numerous insects are attracted to the nectar-laden flowers and it is not at all uncommon to see flies, beetles, ants, bees, wasps, and butterflies on the flowers at the same time.” The Xerces Society has also identified Common milkweed as a priority species for habitat restoration efforts. Common milkweed also quickly spreads through rhizomatous roots and forms colonies which aids in its longevity. **Therefore, common milkweed is clearly an important species that is critical to the survival of monarch butterflies. Within meadows and designed landscapes, common milkweed should be planted along with a diversity of other milkweed species on federal landscape plans to the fullest extent possible and as appropriate for the site conditions.”***

A 2014 Xerces Society publication states that studies have indicated that the majority (85-92%) of monarch butterflies overwintering in Mexico had fed on common milkweed as caterpillars. The publication further states: *“Studies such as these demonstrate that the protection of common milkweed populations is essential to sustain eastern monarch populations.”* (Reference 4)

A publication that the Arlington County Department of Parks and Recreation’s natural resources manager, Alonso Abugattas, authored in 2020 states: *“**Milkweeds** – *Asclepias* are well documented as being wonderful pollinator plants, as well as the host plants for such *Lepidoptera* as Monarch butterflies and at least 11 other documented species. **The local monarch favorite is Common Milkweed (*A. syriaca*),”*** (Reference 5).

A 2024 article that Chip Taylor, the founder of Monarch Watch, authored states: “*Although monarch larvae are known to feed on about 30 of the more than 70 species of milkweeds known to occur in the United States and Canada, the eastern migration is largely dependent on three of these species, *Asclepias syriaca*, *A. viridis* and *A. asperula*. In fact, it is probably safe to say that there would be no eastern migration without these three species.*” (Reference 6). *A. syriaca* is the only one of those three species that is native to the National Capital Region and its vicinity.

Within its range, *A. syriaca* can be found in a broad array of habitats from croplands to pastures, roadsides, ditches, and old fields. The plant typically grows to a height of 3-5 feet, but can reach 8 feet in ditches and gardens. The plant is not shade-tolerant and needs lots of sunlight. (References 7 and 8).

Although *A. syriaca* spreads through [modified roots](#) and forms colonies, routine maintenance can easily control the plant’s spread. Mowing or removal of unwanted plants two or three times a year will stop the spread.

Recommendation

Add Common Milkweed (*Asclepias syriaca*) to the section on perennials and groundcovers in the proposed landscape schedule on page 28.

Native Species

The NCPC Guide states on page 4 that the U.S. Department of Agriculture’s (USDA’s) 2023 Maryland Wildflower Habitat Establishment Guide suggests the following in plant species selection:

“100% Native Species. Focus plant selection on native perennials that provide pollen- and nectar-rich forage for pollinators and beneficial insects, and larval food plants for butterflies and moths. Native trees and shrubs are essential components of habitat needed to support a wide variety of wildlife and should also be considered for inclusion when designing wildflower plantings.” In addition, many non-native plants are either presently recognized as invasive or may become so in the future.

The proposed landscape schedule on page 28 contains six plants that are not native to North America but are not native to the National Capital Region. These may not provide forage for native pollinators or food for the caterpillars of native butterflies and moths.

The landscape schedule's non-native species include:

- Summersweet (*Clethera alnifolia*). *Clethera alnifolia* is native to [swamps, sea shores, stream banks, and hillside bogs](#) from Mississippi to Florida and north through the eastern portions of coastal states to southern Maine, but is not native to Maryland, the District of Columbia, and northern Virginia.
- Inkberry Holly (*Ilex glabra* 'Shamrock'). *Ilex glabra* is native to [bogs and to wet woods of coastal plains](#) from Nova Scotia to Florida and west to Louisiana, but is not native to the District of Columbia and its Maryland and Virginia suburbs.
- Emerald Green Arborvitae (*Thuja occidentalis* 'Smaragd'). *Thuja occidentalis* is native to [swampy areas, lake margins, and open, rocky hillsides](#) from eastern and central Canada south to northern Illinois, Ohio and New York with scattered populations further south in the Appalachians to North Carolina, but is not native to the District of Columbia and its Maryland and Virginia suburbs.
- Autumn Goldenrod (*Solidago sphacelata* 'Golden Fleece'). *Solidago sphacelata* is native to [dry rocky forests, woodlands, barrens, and outcrops in south central and southwestern Virginia](#) and elsewhere in the southern and midwestern United States, but is not native to Maryland, the District of Columbia, and northern Virginia.
- Dewey Blue Switchgrass (*Panicum amarum* 'Dewey Blue'). *Panicum amarum* is native to [sandy coastal shores and dunes](#) from Massachusetts and New York, south to Florida and west to New Mexico, but is not native to the District of Columbia and its Maryland and Virginia suburbs.

- Buffalo Grass (*Bouteloua dactyloides*). [*Bouteloua dactyloides*](#) is native to [prairies, plains, meadows, pastures, savannas](#) from Manitoba and Saskatchewan south through the central plains states of the United States, but is not native to Maryland, the District of Columbia, and Virginia.

Recommendation

Replace the above six plants with species that are native to the National Capital Region and have similar characteristics (e.g., size, shape, flower and foliage color, tolerance to local conditions, etc.) to those of the non-natives.

Cultivars

The NCPC Guide states on page 4: *“Take care when selecting plant cultivars. Some plants are selected for traits attractive to humans but not pollinators (size, color, shape). Sometimes these selections or cultivars of plants lose the traits/indicators on which pollinators rely. For instance the coneflower (*Echinacea purpurea*) and many of its cultivars are excellent for pollinators, whereas a number of double-flowered *Echinacea* cultivars have little appeal for pollinators. **Therefore, prioritize the original native species whenever possible.**”* To support this statement, the Guide cites a Xerces Society publication, which also notes that *“cultivars often have reduced nutritional benefits, and haven’t been well-enough studied to identify those which may be harming pollinators in that regard”* and that *“Some cultivars, bred for foliage color, may even be toxic to insects.”* (Reference 9).

A 2021 publication describing the benefits and drawbacks of cultivars as they relate to pollinators states: *“The rule of thumb is that cultivars that significantly affect flower structure and/or color are likely to alter their appeal to pollinators.”* The publication further states: *“There is a strong indication that altering leaf color, and the chemical changes this implies, reduces a plant’s ability to serve as a resource for herbivorous insects.”* (Reference 10).

The landscape schedule should therefore not contain any cultivars unless they are more resistant to disease than their parents are. However, the schedule contains eleven cultivars that lack any such increased resistance. These are:

- [Low Scape Hedger Black Chokecherry](#) (*Aronia melanocarpa* 'UCONNAM166'). **Parent native.**
- [Inkberry Holly](#) (*Ilex glabra* 'Shamrock'). **Parent not native.**
- [Winterberry Holly](#) (*Ilex verticillata* 'Winter Red'). **Parent native.**
- [Emerald Green Arborvitae](#) (*Thuja occidentalis* 'Smaragd'). **Parent not native.**
- [Big Bluestem](#) (*Andropogon gerardi* 'Blackhawks'). **Parent native.**
- [Hibiscus](#) (*Hibiscus* 'Lord Baltimore'). **Parents native.**
- [Autumn Goldenrod](#) (*Solidago sphacelata* 'Golden Fleece').
- [Blazing Star](#) (*Liatris spicata* 'Kobold'). **Parent native.**
- [Dewey Blue Switchgrass](#) (*Panicum amarum* 'Dewey Blue'). **Parent not native.**
- [Cape Breeze Dwarf Switch Grass](#) (*Panicum* 'Cape Breeze'). **Parent native.**
- [Beardtongue](#) (*Penstemon digitalis* 'Dark Towers'). **Parent native.**

Recommendation

Replace all of the above cultivars with their native parents (if any) or with native species that have similar characteristics to the cultivars (e.g., size, shape, colors of flowers and foliage, light requirements, tolerance to local conditions, etc.).

Wind-Pollinated Grasses and Sedges

A 2023 United States Department of Agriculture (USDA) publication entitled "*Maryland Wildflower Habitat: Planting for Pollinators and Beneficial Insects*" states on page 5 regarding species selection for seed mixes, "... *non-competitive native bunch grasses may be included for herbaceous plantings at a low rate — less than 25% of the mix. When monarch habitat is the primary purpose, criteria for the target plant community require that at least 1.5% of the seeds in the mix should be native milkweeds and at least 60% should be nectar plants.*" (Reference 11).

The landscape schedule contains the following wind-pollinated bunch grass that is native to the National Capital Region:

- [Virginia Wild Rye](#) (*Elymus virginicus*)

Recommendation:

Ensure that any additional selected bunch grasses are native to the National Capital Region. **Also, ensure that those selected together comprise less than 25% of the total number of herbaceous plantings.**

Additional Plantings

It is important to **add Black Cherry** ([Prunus serotina](#)) to the proposed landscape schedule on page 28. This tree's white flowers bloom from March through June (Reference 12). An [EcoBlog web page](#) states: "*Native to most of the Eastern half of the U.S., Black Cherry offers nectar and pollen to native pollinators and honey bees. The small red or black fruits are a favorite food of more than 40 species of birds, not to mention, many mammals.*

Black Cherry also serves as the host plant for an amazing array of butterflies and moths – more than 450 species, including: Eastern Tiger Swallowtail, Cherry Gall Azure, Viceroy, Columbia Silkmoth, Promethea Moth, Small-eyed Sphinx Moth, Wild Cherry Sphinx Moth, Banded Tussock Moth, Band-edged Prominent, Spotted Apatelodes and Red-Spotted Purple" (Reference 13).

It is also important to **add Sassafras** ([Sassafras albidum](#)) to the proposed landscape schedule. The tree's fragrant yellow-green flowers bloom from March through May, providing nectar and pollen to honey bees and many native pollinators (Reference 14). Birds and mammals eat the tree's blue-black fruits. Caterpillars of the locally-native Spicebush Swallowtail, Eastern Tiger Swallowtail, and Palamedes Swallowtail butterflies and Promethea, Imperial and Io moths feed on its foliage, as do those of more than 30 other species of butterflies and moths (References 15 and 16).

A local naturalist, Alonso Abugattas, has written: “*My all-time favorite pollinator shrub is [Buttonbush \(Cephalanthus occidentalis\)](#). I've not only seen tons of bees, butterflies, wasps and even hummingbirds nectar on the fragrant white globular flowers, but you'd be amazed at all the pollinators who visit the flower heads at night. I've seen many moths, beetles, and other nocturnal fliers attracted to the white blooms and their perfume. This multi-stemmed shrub can grow to 20' (though 5'-12' is more typical) right in the water, though it can take drier conditions as well Where it gets sufficient sun, it can bloom profusely, and often for more than a month at a time. At least 24 different bird species have been recorded eating the nutlets (about 8 of these being waterfowl). Nineteen different caterpillar species have been found to feed on it as well,*” (Reference 17). **I therefore suggest that you add Buttonbush to the proposed landscape schedule where conditions are suitable for that plant.**

Protection

Protect all plantings from trampling and dogs by using low fencing or elevation.

Plant Lists

To best support native pollinators, I suggest that you select plants from the following lists:

- United States Department of Agriculture (2018). [Maryland Larval Host and Nectar Plants For Monarchs](#). Only select plants that are checked in columns “P” (Piedmont) and “CP” (Coastal Plain) regions. (Note: This list does not contain any trees or shrubs.)
- Xerces Society for Invertebrate Conservation (2023). [Native Plants for Pollinators & Beneficial Insects: Mid-Atlantic](#). (Note: This list is less specific to plants native to Maryland and its vicinity than is the U.S. Department of Agriculture’s list.)

- Xerces Society for Invertebrate Conservation (2025). [Monarch Nectar Plants: Mid-Atlantic](#). (Note: This list is less specific to plants native to Maryland and its vicinity than is the U.S. Department of Agriculture’s list.)
- Monarch Watch (2015). [Plants for Butterfly and Pollinator Gardens: Native and Non-native Plants Suitable for Gardens in the Northeastern United States](#). Only select plants that are checked in columns “N” (Native) and “M-A” (Mid-Atlantic). (Note: This list is less specific to plants native to Maryland and its vicinity than is the U.S. Department of Agriculture’s list.)
- Wild Ones (wildones.org). [Nectar Plants for Monarchs](#). (Note: This list is less specific to plants native to Maryland and its vicinity than is the U.S. Department of Agriculture’s list.)
- Mills, Elaine (August 31, 2025). [20 most valuable woody and perennial native plant genera in terms of supporting biodiversity in the mid-Atlantic region](#). Table in: “Making Wise Plant Choices, Part 2: Keystone Plants, 2025”. Virginia Cooperative Extension. (Note: Only use plants in these genera that are native to the National Capital Region.)
- Heiser, Carol A. (June 24, 2020). [Celebrate Pollinators!](#). Virginia Department of Wildlife Resources. “Choose native plant species that are highly beneficial to pollinators, such as plants in the Asteraceae family, which includes several genera like *Coreopsis*, *Helianthus* (sunflowers), *Rudbeckia* (coneflowers), *Solidago* (goldenrods), and *Eutrochium* (pyeweed), to name a few. Mountain mints (*Pycnanthemum*) and milkweeds (*Asclepias*) are also greatly valued by pollinators.” (Reference 18)

To find maps identifying the local distributions of native plants in the above lists, see the [United States Department of Agriculture’s PLANTS Database](#) and the [Digital Atlas of the Virginia Flora](#).

Please contact me by e-mail if you have any questions or concerns about the contents of this message.

Thank you.

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5. Abugattas, Alonso (June 2020). [Top “10” Lists of Wildlife Plants](#).
6. Taylor, Chip (March 29, 2024). "[Is the eastern monarch population continuing to decline?](#)". *Monarch Watch Blog*
7. Taylor, David. U.S. Department of Agriculture, U.S. Forest Service. Common Milkweed ([Asclepias syriaca](#) L.). Plant of the Week.

8. Monarch Watch (2010). [Asclepias syriaca](#), (Common Milkweed). Bring Back The Monarchs.
9. Wheeler, Justin (November 21, 2017). [Picking Plants For Pollinators: The Cultivar Conundrum](#). Xerces Society for Invertebrate Conservation.
10. Vazquez, Claudio (2021). [Cultivars...Don't shoot the messenger!](#) “The rule of thumb is that cultivars that significantly affect flower structure and/or color are the ones likely to alter their appeal to pollinators.” United States Department of Agriculture (January 2023).
11. [Maryland Wildflower Habitat Establishment Guide: Planting for Pollinators and Beneficial Insects](#). Page 5: **Species Selection - Native Species**: “For herbaceous plantings, non-competitive bunch grasses (e.g., broomsedge, little bluestem, purpletop) may be included at a low rate — less than 25% of the mix based on pure live seed (PLS) per square foot.
..... **Specialized Monarch Habitat**: When monarch habitat is the primary purpose, criteria for the target plant community requires at least 1.5% native milkweeds (the larval food source) and at least 60% monarch nectar plants that bloom when adult monarchs are present in the local area (breeding and migration).
12. [Prunus serotina](#). Plant Database. Lady Bird Johnson Wildflower Center, The University of Texas at Austin.
13. Eierman, Kim. [Powerful Prunus: A Visit With Dr. Doug Tallamy](#). EcoBlog.
14. [Sassafras albidum](#). Plant Database. Lady Bird Johnson Wildflower Center, The University of Texas at Austin.
15. Long, Donna L. [Sassafras Trees for Attracting Birds, Butterflies, and Moths](#).
16. Laurits, Ginger. [Sassafras \(Sassafras albidum\)](#). Wild Seed Project.

17. Abugattas, Alonso (August 30, 2016). [Buttonbush](#). Capital Naturalist.
18. Heiser, Carol A. (June 24, 2020). [Celebrate Pollinators!](#). Virginia Department of Wildlife Resources.