

National Capital Planning Commission Meeting
July 9, 2026

Jelleff Recreation Center Modernization
NCPC File Number: 8576

Agency: District of Columbia Department of General Services

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.

Sheets L2.1 and L2.2 in the applicant's [Submission Materials](#) contain the project's plant schedules. Several entries and omissions in these schedules are not consistent with the NCPC Guide's recommendations. These include:

Native Plants

The NCPC Guide states on page 4:

“Non-Meadow and Designed Landscapes

Non-meadow and designed landscapes should also support pollinator habitats. While meadows primarily consist of herbaceous flowering plants, non-meadow and designed landscapes may primarily consist of trees, shrubs, perennials, and other types of vegetation.

For designed landscapes, Supporting the Health of Honey Bees and Other Pollinators, developed in partnership between CEQ (Council on Environmental Quality) and GSA (General Services Administration), recommends the following:

- *Choose plants that support the forage, reproduction, shelter and/or hibernation of pollinators specific to your ecoregion.*

- *Choose plants that are best for your ecoregion; preferably native plants to which pollinators are most accustomed. Native plants evolved along with native pollinator species and are well adapted to thrive in local conditions. Using some non-native plants is acceptable as long as they are not considered invasive.”*

It is important to recognize that it may take a long time for a non-native plant to become designated as invasive after it has been introduced into an area. For example, Japanese Honeysuckle (*Lonicera japonica*) was first introduced in 1806 as an ornamental ground cover. It slowly escaped cultivation and became widely established by the early 1900s, **a century after its initial introduction**. This plant is now an aggressive, invasive vine that readily colonizes new habitats (Reference 2). To prevent repetitions of these types of events, **do not install non-native plants and cultivars of such plants unless they are sterile.**

The project’s plant schedules contain 40 species that are not native to the National Capital Region. Sixteen (16) of these are that are not native to North America. Four (4) are native to North America but are not native to the National Capital Region. One or more may not provide forage for native pollinators or food for the caterpillars of native butterflies and moths.

These non-native species are:

Plants not native to North America

- Ginkgo Tree (*Ginkgo biloba*). [*Ginkgo biloba*](#) is native only to southeastern China.

In SOPRANATURE EcoCline Pre-Grown Sedum Mats:

- *Delosperma nubigenum*. [*Delosperma nubigenum*](#) is native only to Free State and Lesotho in southern Africa.
- *Petrosedum pruinatum* (synonym of [*Sedum reflexum*](#)). [*Petrosedum pruinatum*](#) is native only from northwestern Spain to north-central Portugal.

- *Phedimus spurius* (synonym of [Sedum spurium](#)). [Phedimus spurius](#) is native only from northeastern Turkey to northern Iran.
- *Phedimus takesimensis*. [Phedimus takesimensis](#) (synonym of [Sedum takesimensis](#) and [Phedimus kamtschaticus](#)) is native only from far eastern Russia to northern China and northern Japan.
- *Sedum acre*. [Sedum acre](#) is native only from Greenland and Europe to the Mediterranean area and the Caucasus.
- *Sedum hispanicum* ‘Purple Form’. [Pistorinia hispanica](#) (synonym of [Sedum hispanicum](#)) is native only to Portugal and Spain.
- *Sedum hybridum* ‘Immergrunchen’. [Sedum hybridum](#) ‘Immergrunchen’ is native to Siberia and Central Asia.
- *Sedum kamtschaticum* var. *floriferum*. [Sedum kamtschaticum](#) (synonym of [Phedimus kamtschaticus](#)) is native only from far eastern Russia to northern China and northern Japan.
- *Sedum reflexum* ‘Blue Spruce’. [Sedum reflexum](#) (synonym of [Petrosedum pruinaum](#)) is native only to Portugal and Spain.
- *Sedum reptans* ‘Angelina’. [Sedum reptans](#) (synonym of [Sedum reflexum](#) and [Petrosedum pruinaum](#)) is native only to Portugal and Spain.
- *Sedum sexangulare*. [Sedum sexangulare](#) is native only to Europe.
- *Sedum spurium* ‘Fuldaglut’. [Sedum spurium](#) (synonym of [Phedimus spurius](#)) is native only from northeastern Turkey to northern Iran.
- *Sedum spurium* ‘John Creech’. [Sedum spurium](#) (synonym of [Phedimus spurius](#)) is native only from northeastern Turkey to northern Iran.

- *Sedum spurium* ‘Red Carpet’. [*Sedum spurium*](#) (synonym of [*Phedimus spurius*](#)) is native only from northeastern Turkey to northern Iran.
- *Sedum spurium* ‘Tricolor’. [*Sedum spurium*](#) (synonym of [*Phedimus spurius*](#)) is native only from northeastern Turkey to northern Iran.

Plants native to North America the National Capital Region

- Summersweet Clethra (*Clethra alnifolia*). [*Clethra alnifolia*](#) is native to [swamps, sea shores, stream banks, and hillside bogs](#) from Mississippi to Florida and north through eastern portions of the coastal states to southern Maine, but is not native to the District of Columbia or its Maryland and Virginia suburbs.
- Inkberry Holly (*Ilex glabra*). [*Ilex glabra*](#) is native to [bogs and wet woods of coastal plains](#) in the coastal plain from Nova Scotia to Florida and west to Louisiana, but is not native to the District of Columbia and its Maryland and Virginia suburbs.
- Skyrocket Juniper (*Juniperus scopulorum* ‘Skyrocket’). [*Juniperus scopulorum*](#) is native to [rocky or sandy hillsides and mountains](#) from British Columbia south to Arizona and east to Saskatchewan, North Dakota and western Texas, but is not native to Maryland, the District of Columbia, or Virginia.

In SOPRANATURE EcoCline Pre-Grown Sedum Mats:

- *Sedum divergens*. [*Sedum divergens*](#) is native from Alaska and British Columbia south to California and east to Alberta, but is not native to Maryland, the District of Columbia, or Virginia.

Recommendation

Remove from the planting plan all 20 species that are native to North America but are not native to the National Capital Region. Replace these

with plants that are native to the National Capital Region. Replace the non-native sedums with native [Wild Stonecrop \(*Sedum ternatum*\)](#), [Cliff Stonecrop \(*Sedum glaucophyllum*\)](#), and/or [Allegheny Stonecrop \(*Hylotelephium telephioides*\)](#).

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 3).

The project’s planting palette should therefore not contain any cultivars unless they are more resistant to disease than their parents are. However, the plant schedules contain eleven (11) cultivars that lack such increased resistance. These are:

- [Skyrocket Juniper \(*Juniperus scopulorum* ‘Skyrocket’\)](#). **Parent not native.**

In SOPRANATURE EcoCline Pre-Grown Sedum Mats:

- [Phedimus takesimensis ‘Golden Carpet’](#). **Parent not native.**
- [Sedum album ‘Murale’](#). **Parent not native.**
- [Sedum hispanicum ‘Purple Form’](#). **Parent not native.**
- [Sedum hybridum ‘Immergrunchen’](#). **Parent not native.**
- [Sedum reflexum ‘Blue Spruce’](#). **Parent not native.**
- [Sedum reptre ‘Angelina’](#). **Parent not native.**
- [Sedum spurium ‘Fuldaglut’](#). **Parent not native.**

- [Sedum spurium ‘John Creech’](#). Parent not native.
- [Sedum spurium ‘Red Carpet’](#). Parent not native.
- [Sedum spurium ‘Tricolor’](#). Parent not native.

Recommendation

Replace *Juniperus scopulorum* ‘Skyrocket’ with a native species that has similar characteristics to the cultivar (e.g., size, shape, colors of flowers and foliage, survivability under the site’s conditions, etc.). Replace the ten sedum cultivars with native [Wild Stonecrop \(*Sedum ternatum*\)](#), [Cliff Stonecrop \(*Sedum glaucophyllum*\)](#), and/or [Allegheny Stonecrop \(*Hylotelephium telephioides*\)](#).

Wind-pollinated grasses, sedges and rushes

The planting plan lists the following five wind-pollinated grasses, sedges and rushes:

- [Pennsylvania Sedge \(*Carex pensylvanica*\)](#)
- [Tussock Sedge \(*Carex stricta*\)](#)
- [Soft Rush \(*Juncus effusus*\)](#)
- [Switchgrass \(*Panicum virgatum*\)](#)
- [Little Bluestem \(*Schizachyrium scoparium*\)](#)

Wind-pollinated grasses and rushes don’t produce nectar, which feeds butterflies, moths, hummingbirds, and flies that pollinate plants. Grasses and rushes can’t feed them. While the larvae of some pollinators and other insects feed on the stems and leaves of wind-pollinated plants, many more feed on the foliage of nectar plants.

Further, some grasses and rushes are aggressive. They can crowd out desirable nectar plants.

A 2023 United States Department of Agriculture (USDA) publication entitled "[Maryland Wildflower Habitat Establishment Guide: 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 4).

Those percentages should remain the same when landscapers install plants rather than seeds, as they will for the herbaceous plantings in your project.

Recommendation

Ensure that all of the ornamental grasses and rushes 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 planting plan. This tree’s white flowers bloom from March through June (Reference 5). 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 6).

It is also important to **add Sassafras ([Sassafras albidum](#))** to the planting plan. The tree’s fragrant yellow-green flowers bloom from March through May, providing nectar and pollen to honey bees and many native pollinators (Reference 7). 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 8 and 9).

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 10).

Recommendation

Add Black Cherry, Sassafras and Buttonbush to the plant schedules where conditions are suitable for those plants.

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 11)

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](#).

To find the characteristics of plants in the above lists, see the [Native Plants Database](#) of the Lady Bird Johnson Wildflower Center at the University of Texas at Austin.

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

Thank you.

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REFERENCES:

1. Free, Stephanie, National Capital Planning Commission (January 4, 2024). Information Presentation: . NCPC File Number 8510.
2. [Japanese Honeysuckle](#). Invasive Species (April 2020). Department of Wildlife Resources, Missouri Department of Conservation, Jefferson City, MO.
3. Wheeler, Justin. Xerces Society for Invertebrate Conservation (November 21, 2017). [Picking Plants For Pollinators: The Cultivar Conundrum](#).
4. United States Department of Agriculture (January 2023). [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).

5. [Prunus serotina](#). Plant Database. Lady Bird Johnson Wildflower Center, The University of Texas at Austin.
6. Eierman, Kim. [Powerful Prunus: A Visit With Dr. Doug Tallamy](#). EcoBlog.
7. [Sassafras albidum](#). Plant Database. Lady Bird Johnson Wildflower Center, The University of Texas at Austin.
8. Long, Donna L. [Sassafras Trees for Attracting Birds, Butterflies, and Moths](#).
9. Laurits, Ginger. [Sassafras \(Sassafras albidum\)](#). Wild Seed Project.
10. Abugattas, Alonso (August 30, 2016). [Buttonbush](#). Capital Naturalist.
11. Heiser, Carol A. (June 24, 2020). [Celebrate Pollinators!](#). Virginia Department of Wildlife Resources.