



Native Plant Society of New Mexico

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December 2, 2015
 Santa Fe National Forest
 Forest Plan Revision Team
 11 Forest Lane
 Santa Fe, NM 87508

Re: Santa Fe National Forest Plan Draft Assessment Report, Volume 1. Ecological Resources

Dear Santa Fe National Forest:

The Native Plant Society of New Mexico respectfully submits the following comments in regard to the above referenced document. We have reviewed Chapter 1, Vegetation, and Chapter 3, At-Risk Species. NPSNM is a non-profit organization with more than 700 members in seven chapters around the state, El Paso, Texas and the region. Our mission is to educate the public about native plants by promoting knowledge of plant identification, ecology, and uses; foster plant conservation and the preservation of natural habitats; support botanical research; and encourage the appropriate use of native plants to conserve water, land, and wildlife.

First of all, we recommend that SFNF employ a Forest botanist. Whether you look at technical definitions or common understanding, the dominant feature of a forest is the plant communities it comprises. It stands to reason that there should be at least one qualified botany professional on the staff of Santa Fe National Forest, which covers five Ranger Districts over two mountain ranges. We realize that the individual Forest does not control all hiring decisions, but this recommendation is of overriding importance to future management and implementation of the current planning effort, so we urge you to do all that is in your power to make it happen.

Regarding the Draft Assessment, this document in its current form is in drastic need of copy editing, due to pervasive shortcomings of document organization, grammar and consistency. Examples from Chapter 1 are provided below. As the draft Assessment is nearly unintelligible to a trained professional reviewer, we can only imagine that it does not provide useful information to the general public wishing to participate in the Forest planning process.

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| Organization | | Move the ERU maps and descriptions to the beginning of the chapter. It is only meaningful to read through the departure from reference analyses when one knows to what the acronyms refer and how the reference conditions were derived. |
| | | Please add a navigation pane. |
| Terms | p.12 | Please explain "clusters of Ecological Subsections". This term is not defined or used anywhere else in the chapter. |
| | p.22 | The term TEU is first used here. Please explain what it means, how it was derived , and how a TEU is similar or different from an ERU. |

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| | p. 48 | "Montane-subalpine grasslands are generally grouped into four vegetative states as identified above. " These terms are not "identified above". |
| | p. 90 | On Figure 12, what is a "stream survey" , who carries it out, and how does it differ from PFC evaluation? |
| Figures | p.13 | Figure 2 shows 3 shades of gray but only one is defined on the legend. |
| Tables | p.21-22 | The text does not state where or how the reference patch size values on Table 5 were derived. |
| | P.24 | The text does not state where or how the reference ground cover values on Table 7 were derived. |
| | p.26 | The text does not state where or how the reference CWD values on Table 8 were derived. |
| | Fire Frequency | Table 11 should appear before Table 9 as it defines the Fire Frequency classification used on that table. |
| | Fire Frequency | On Tables 12 and 13, please be consistent in using Roman or regular numerals to distinguish Fire Frequency Classes and Fire Regime Groups. |
| Grammar | p.47 | "Based on the patch size analysis developed specifically for this assessment and is the average of all patches of an ERU that intersect the plan area historical MSG patch sizes, ranged from 94 to 122 acres in size but have been estimated by Vankat (2013) in the range of small openings less than 2.5 acres to large expanses of more than 2,500 acres. " |
| | p.48 | "However, some concern exists in the uncertainty of the models, as the majority of uncertainty for MSG (67 percent) is in the moderate category; meaning future climate projections have a moderate amount of disagreement." |
| | | Similarly garbled sentences occur throughout the chapter, the ones above are just examples. This is not mere pickiness; it is difficult or impossible in many cases to discern what the writer is trying to convey. |

We have identified the following concerns or questions about the content of Chapter 1:

1. There are several instances where indices are used in place of actual field data, which introduces a large amount of uncertainty to the analysis. We recommend that the monitoring schedule to be included in the new management plan should prioritize surveys for snag size and density, coarse woody debris, and (especially) invasive species. It is a bit hard to tell from the report, but it appears that additional riparian habitat condition assessments might also be a priority.
2. On p. 43, the four invasive thistle species on Table 15 should not be lumped together, as they differ in life history, habitat and control strategies. Also, there are native thistle species on the Forest and therefore "thistle" should not be considered necessarily invasive.
3. On Page 44, please list the ERUs that are present but not analyzed due to comprising <1% of the Forest area. Are any of them rare on the landscape scale, or valuable to special status species?
4. On Pages 60-61, if aspen stands are considered to be early seral stages of the MCW, they should be listed as a dominant species in that ERU. Please add a discussion of the aspen decline phenomenon at the plan and context scales.
5. On Page 88, coarse woody debris in streams is a feature of aquatic, not riparian, habitat.

6. On Page 93, how were zone-wide PFC values derived? What percentage of stream miles have been assessed for each ERU on each Forest zone?

Rare plants should not be eliminated from consideration as Species of Conservation Concern due to lack of documented occurrences on the Forest, or insufficient information about their status and trend. Since the 2012 Forest Planning Rule specifies that potential SCC must be known to occur in the plan area, species for which information is lacking should be included on a supplemental list, and prioritized for targeted field surveys in suitable habitat to evaluate occurrence and status for potential addition to the list (we presume the SCC list is a "living document" that will be regularly updated during the life of the management plan). This approach should be taken regarding all rare plants listed on the New Mexico Rare Plant website to occur within SFNF major ecosystem types. Why are plants not included on Table 53 (p.200), showing additional threats to SCC? Please consult closely with the New Mexico Endangered Plant Program within the NM Forestry Division, on all aspects of planning for special status plant species.

Thank you for the opportunity to participate in the planning process by submitting comments during the Assessment phase. We look forward to further interaction during National Environmental Policy Act scoping and review of the eventual Draft Environmental Impact Statement.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rachel Jankowitz', with a long horizontal flourish extending to the right.

Rachel Jankowitz, Conservation Chair
Native Plant Society of New Mexico

