



Native Plant Society of New Mexico  
P. O. Box 35388  
Albuquerque, NM 87176-5388

December 31, 2015

Carson National Forest  
208 Cruz Alta Road  
Taos, NM 87571

Re: Carson National Forest Plan Assessment Report and Needs to Change Document

Dear Carson National Forest:

The Native Plant Society of New Mexico respectfully submits the following comments in regard to the above referenced documents. 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. We have reviewed Chapter II, Ecological Integrity and Sustainability, sections on Terrestrial Ecosystems, Riparian Ecosystems, and At-Risk Species, as well as the Needs to Change Document. We offer feedback on these documents, even though they are considered final, because they will become the basis for the National Environmental Policy Act Existing Conditions analysis in upcoming stages of management plan development.

First of all, we recommend that the Carson NF 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 the Carson National Forest, which covers 1.5 million acres of northern NM, over six Ranger Districts, spanning elevations from 6,000 to 13,161 feet. 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.

We have identified the following concerns or questions about the content of the Assessment Report:

1. Please have document writers review correct usage of the words "effect" and "affect". They are not interchangeable.

Terrestrial Ecosystems

2. On page 18, it does not seem possible that 10 ERUs could each cover more than 10% of the Forest.

3. The Terrestrial Vegetation ERU descriptions and assessments are well done and present a high density of information in a comprehensible format. Please consider 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. Loss of vegetative groundcover is especially significant in systems such as ALP and MSG, where there is no overstory vegetation, and soils tend to be vulnerable to erosion (or complete loss, in the case of ALP). This factor should be weighted more heavily in determining high, medium or low departure from reference in these ERUs. For example, the reduction from 91% to 54% cover in MSG is alarming and should be considered highly, rather than moderately, departed.
5. The plan should recognize the distinctive needs of the Jicarilla RD, in light of its dominance by the PJO ERU, lack of surface water, and the prevalence of stressors from oil and gas development and feral horses. Future trends for PJO should include habitat loss and fragmentation due to energy development as planned in the 2012 Environmental Impact Statement.
6. Page 90 – On Table 13, how was the 2.5 mi/mi<sup>2</sup> road density threshold derived? Road densities below approximately 1.0 mi/mi<sup>2</sup> are often recommended for wildlife habitat. NPSNM does not have a specific recommendation at this time, but the Forest should be transparent as to why any particular threshold was selected.
7. Page 91, Table 14 – How much of the Forest has been surveyed for weed infestation? How recently? Data entirely collected prior to 2005, as implied in the table heading, are not appropriate to use as a current baseline condition.

### Riparian Ecosystems

8. Page 103 - The RASES surveys, conducted between 1987 to 1991, are not suitable for evaluating current existing condition. They reflect a historic condition 25 years ago. If repeated, in whole or in part, they could become the basis for trend analysis.
9. Page 105 – From Figure 25, it appears there are sufficient completed PFC surveys to assess riparian conditions on the Camino Real RD, but not on any other District. It is not appropriate to generalize to the full plan scale from these data.
10. Page 127 – Implementation of Travel Management is likely to affect the future trend of riparian ecosystems and should be included in the trend analysis.
11. Page 133 – For Table 19, please clearly define the derivation of reference condition for all variables. This information is critical to understanding the basis for the departure analyses. As presented, the conclusions on Table 19 appear to be solely derived from Forest staff opinion.

### At-Risk Species

12. Rare plants should not be eliminated from consideration as Species of Conservation Concern due to lack of documented occurrence on the Forest, or insufficient information about their status and trend. Since the 2012 Planning Rule specifies that 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 field surveys in suitable habitat to evaluate occurrence and status for potential addition to the SCC list. This approach should be taken for all species listed on the New Mexico Rare Plant website to occur within Carson National Forest ecosystems.

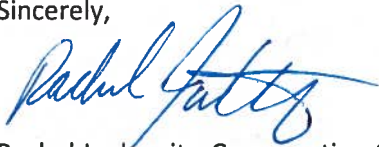
13. Please consult closely with the New Mexico Endangered Plant Program within the NM Forestry Division, on all aspects of planning for special status plant species.

We have identified the following concerns or questions about the content of the Needs to Change document:

- A. "Throughout the Plan" – There is a clear need for field surveys or other research, to collect data on several ecological parameters. Many variables have no data, or insufficient coverage, and much of the existing information is out of date. As the plan may last 30-35 years, like many of the current Forest management plans have done, it should include specific provisions for scheduling repeated data collection. The Needs for Change should explicitly acknowledge priority data needs.
  
- B. "Vegetation" – the information in the Assessment clearly supports a need for intensive protection and restoration efforts in the ALP, MSG and BP ERUs. Under Item 5, regarding the use of wildland fire in fire-adapted systems, add targeted thinning to mitigate the intensity of future wildfires. "Water and Watersheds" – Add an item to implement physical restoration of selected closed roads.

Thank you for this opportunity to participate in the planning process by submitting comments on the Assessment and Needs to Change. We look forward to further interaction during NEPA scoping and review of the eventual Draft Environmental Impact Statement.

Sincerely,



Rachel Jankowitz, Conservation Chair  
Native Plant Society of New Mexico

