



Native Plant Society of New Mexico
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December 13, 2016

Gila National Forest, Attn.: Matt Schultz
3005 E. Camino del Bosque
Silver City, NM 88061

Re: Gila National Forest Plan Revision Draft Assessment Report

Dear Mr. Schultz:

The Native Plant Society of New Mexico respectfully submits the following comments in response to the Draft Assessment Report. We have reviewed Section 1, Ecological Resources, focusing on Chapter 2, Upland Vegetation. NPSNM is a non-profit organization with more than 700 members in seven chapters around the state and in El Paso, Texas. 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.

For each Ecological Response Unit (ERU), the Draft Assessment states that “There is no current Forest data that shows how many acres within the ERU that are occupied by nonnative invasive plants”. While we have no reason to believe that weeds are a major problem on the Gila, this does represent a data gap that should be addressed in order to establish a baseline for future monitoring and management. Baseline monitoring should be added to the Need-for-Change statements regarding vegetation. Priority locations for invasive plant surveys could include wildfire scars and other locations subjected to surface disturbance.

In the sections titled “Gila NF Seral State Proportion (Vegetation Structure) – Current Departure” and “Gila NF Local Unit Variability in Seral State Departure from Reference Condition”, for each ERU, the word “significant” is used in ways that are not consistent with the definition given on page 20, which is that the departure from reference is greater than 33% (either Moderate or High). For example, departure is often described as “Moderate but significant”, which is redundant given the above definition. Similarly, it is unclear whether or not a “significant under representation” of a certain size class of trees is a statement of statistical confidence (if so, please indicate the level of confidence that is considered significant). Please review all ERU write-ups to ensure that terminology is used consistently.

Terminology used in Table 86, page 171, “Fire regime condition class for each ERU for the Forest and local units”, is also a bit unclear. Three FRCCs are defined in the text; what is the meaning of FRCC IV which appears in some of the boxes on the table? Also how is it that the Reference Condition can be departed from reference?

Finally, NPSNM would like to reiterate our concern with the 2012 Planning Rule procedure for establishing the Species of Conservation Concern list. Rare plants should not be eliminated from consideration as SCC due to lack of documented occurrences on the Forest, or insufficient information about their status and trend. Rather, such species should be included on a supplemental list, and prioritized for field surveys to evaluate their occurrence and status.

Thank you for the opportunity to participate in the planning process by submitting comments on the Draft Assessment document. NPSNM appreciates the effort that went into developing this well-organized and thorough assessment of Gila NF resources. We look forward to further interaction during upcoming stages of the planning process.

Sincerely,

Rachel Jankowitz, Conservation Chair
Native Plant Society of New Mexico