



Native Plant Society of New Mexico

P. O. Box 35388

Albuquerque, NM 87176-5388

Tom Church, Cabinet Secretary
New Mexico Dept of Transportation
PO Box 1149
Santa Fe NM 87504-1149

Dear Secretary Church,

The Native Plant Society of New Mexico is a non-profit organization with more than 900 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.

We write you at present to communicate concerns that were brought to our attention by individual NPSNM members who are worried about current NMDOT right-of-way maintenance practices. We recognize that mowing and herbicides are necessary tools for the provision of safe and efficient highways. However, we believe that incorporating those tools into a comprehensive state-wide Integrated Vegetation Management (IVM) system would yield the ecological services, scenic qualities and economic benefits that follow from biologically healthy rights-of-way.

Many other DOTs across the nation have significantly reduced mowing costs and herbicide use through the use of IVM programs. As described in the Washington State DOT IVM Plan, IVM is a coordinated decision-making process that uses the most appropriate site-specific vegetation management practices, along with a monitoring and evaluation system, to achieve roadside maintenance goals and objectives in an environmentally and economically sound manner. An IVM plan is designed to determine the right tool for the right plant at the right place and time. In addition to mowing, trimming and the selective use of herbicides, those tools might include release of weed-eating insects, soil improvement, planting native species, and hand-pulling or hoeing. The plan should include identification, mapping and voluntary avoidance of rare native plant species, as listed in the NM Rare Plant Conservation Strategy recently adopted by the NM Energy, Minerals & Natural Resources Department.

Benefits of implementing such a system on New Mexico rights-of-way would include:

- Nectar and pollen resources for insect pollinators, which are critical to the agricultural economy;

- Potentially reduced chemical impacts to migratory birds and aquatic systems;
- Interconnected pathways for plant gene flow, especially as populations respond to a changing climate;
- A pleasing aesthetic experience for travelers, commuters and economically important tourists;
- Improved public relations through reduced controversy over the use of herbicide in proximity to communities;
- Cost savings on herbicides and fuel;
- Watershed protection; and,
- Establishment of low-maintenance, non-invasive plant assemblages compatible with the surrounding ecosystem.

The Federal Highway Administration supports the principles of sustainable environments and provides several resources for management of the roadside environment (<https://www.environment.fhwa.dot.gov/ecosystems/vegmgmt.asp>). The FHWA and NMDOT already spend millions of dollars per year on revegetation of construction projects with native species; this investment should be protected from damage by subsequent DOT maintenance practices. In many areas, roadside vegetation is already being properly managed with minimal herbicide use and single-pass mowing. NPSNM encourages NM DOT to follow other state DOTs in adopting progressive and ecologically sensitive vegetation maintenance practices on a state-wide level.

Sincerely,

Tom Stewart, President
Native Plant Society of New Mexico