



Native Plant Society of New Mexico

P. O. Box 35388
Albuquerque, NM 87176-5388

April 23, 2018

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

Re: Gila National Forest Preliminary Draft Land Management Plan

Dear Gila NF:

The Native Plant Society of New Mexico respectfully submits the following comments in response to the Preliminary Draft Land Management Plan (Plan). NPSNM is a non-profit organization with approximately 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.

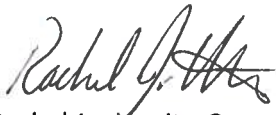
NPSNM supports the general approach taken in the Plan, of defining historic ranges of spatial and temporal variability by Ecological Response Unit, and aiming to restore a similar range of conditions. However, we are disappointed that climate change, or the synonymous phrase "long-term trends in climate", is underemphasized. The Plan is intended to guide Forest management for the next 15 years; it may actually be in effect somewhere between 15 years and the nearly 35 years that the current Plan has lasted. Resiliency to disturbance will be more difficult to achieve if the Plan fails to use the best available scientific information, which indicates directional (warmer) change in climate and an increase in extreme weather events. It is crucial that management emphasize adaptation to variability *outside the historic range*, especially when contemplating future fire management. We are encouraged that the draft Plan does include examples such as planning for the event that the 100-year flood becomes a 50- or 10-year event. The forthcoming Monitoring section should focus on detecting and mitigating the effects of climate change, through the use of adaptive management.

In the Plan chapter on Rare and Endemic Species, on page 84, it is twice suggested that the Forest might collaborate about rare plants with the NM Department of Game & Fish. NMDGF has no jurisdiction or expertise on rare plant species and should be removed from this section of the text. They would be an appropriate collaborator regarding rare animal species.

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. NPSNM fully supports the Gila Native Plant Society, a chapter of NPSNM, regarding their separate submission of a spreadsheet of information to inform the Species of Concern list, as well as their proposed Special Botanical Areas, and urges the Forest to adopt the recommendations therein.

Thank you for the opportunity to participate in the planning process by submitting comments on the Preliminary Draft Land Management Plan document. We look forward to further interaction during upcoming public comment stages of the planning process.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachel Jankowitz". The signature is fluid and cursive, with the first name being the most prominent.

Rachel Jankowitz, Conservation Chair
Native Plant Society of New Mexico