



Native Plant Society of New Mexico

P. O. Box 35388

Albuquerque, NM 87176-5388

October 19, 2018

Dear Lincoln National Forest:

This letter is in response to your request for public comment on the recently released Draft Assessment of Sustainability Conditions and Trends, Volume 1 - Ecological. The stated purpose of the assessment process is to rapidly evaluate readily available existing information about relevant ecological, economic, and social conditions, trends, and sustainability and their relationship to the current Land and Resource Management Plan, within the context of the broader landscape, as required by the USDA Forest Service's 2012 Planning Rule.

This comment is submitted on behalf of the Native Plant Society of NM, a non-profit with approximately 900 members in seven chapters located 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. Our comment consists of two parts: this letter discussing the information contained in the Draft Assessment report; and enclosed notes by Jim McGrath, a member of the NPSNM Conservation Committee and a botanist with field experience conducting plant surveys on the Lincoln NF. Mr. McGrath's notes are in regard to the Species of Conservation Concern lists found on Tables 172 and 173 of the Draft Assessment document.

NPSNM supports the general forest planning approach of defining historic ranges of spatial and temporal variability by Ecological Response Unit and aiming to restore a similar range of conditions. We also appreciate that the Lincoln NF has utilized the findings of the regional Climate Change Vulnerability Assessment to develop a view of potential future conditions informed by the best available science. This conceptual framework can provide a solid basis for decisions about restoration priorities and other management actions.

However, the ability of land managers to influence Forest conditions toward a desired state is undermined by a lack of information documenting current conditions. Areas where the Draft Assessment report indicates inadequate or

obsolete data include: invasive weeds, riparian condition, and terrestrial vegetation communities (Terrestrial Ecological Unit Inventory and Integrated Landscape Assessment Project). For riparian area assessment, please conduct Proper Functioning Condition (PFC) evaluation using an interdisciplinary team and the checklists that were designed into the process, rather than compiling "composite estimates from resource specialists" without the use of formal checklists, as described in the Draft Assessment. Regarding the example shown on Table 32, it is crucial to analyze community composition at the level of species, not genera. The new Forest Plan would be an appropriate venue to identify and prioritize data gaps.

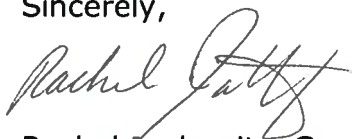
Please plan to continue exploring options to combat the white pine blister rust, including engagement with the research community, monitoring of infestation status, management of natural resistance evolution, and potentially, in high value stands at high risk, planting nursery-bred or selected resistant seedlings, and pruning.

On page 7 of the Draft Assessment, Consideration of Other Plans, add the NM Forestry Division's Rare Plant Conservation Strategy. On page 421, add Kelly Allred's 2012 Flora Neomexicana to the list of information sources on plant taxonomy.

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. Please continue to work closely with the NM Energy, Minerals and Natural Resources Forestry Division's Endangered Plant Program Coordinator on all issues related to special status species.

Thank you for this opportunity to participate in the planning process by submitting comments on the Draft Assessment document. We look forward to reviewing the forthcoming Draft Forest Plan.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rachel Jankowitz".

Rachel Jankowitz, Conservation Chair
Native Plant Society of New Mexico

TO: Rachel Jankowitz, NPSNM Conservation Chair
FROM: Jim McGrath, Field Botanist and member, NPSNM Conservation
Committee
DATE: October 8, 2018
RE: Rare Plants in Lincoln National Forest as it pertains to the Lincoln NF
forest management plan revision

I have reviewed Tables 172 and 173 in the Lincoln NF Plan Draft Assessment Report per your request. I found a couple blatant errors (see my Notes on Lincoln NF Rare Plants) pertaining to *Euphorbia brachycera* and *Philadelphus argyrocalyx*.

Following are my recommendations. It would be best to have Daniela Roth and Bob Sivinski review the two tables as they know more about NM rare plants than anyone else.

Table 172. This table is a list of potential species for consideration as Species of Conservation Concern (SCC), but are NOT proposed for listing as SCC by Lincoln NF. In other words, these species are being rejected as Species of Concern. Generally, the list includes many species that are rejected because the habitats where they occur are simply not threatened by human-based activities. A good example of this are cliff-dwelling plants.

I generally agree with the assessments of each species. However, I recommend that the following species be proposed for listing as Species of Conservation Concern (SCC):

Abies lasiocarpa – corkbark fir is not rare, but it would be an indicator of the effects of climate change – as it may begin to decline as the climate warms.

Epipactis gigantea – widespread, but it occurs in wetlands, especially seeps and ledges and would serve as an indicator of declining wetlands, especially some unique ones, as a result of prolonged drought.

Philadelphus argyrocalyx - endemic to Sacramento Mountains and White Mountains. Only 14 SEINet records. Not enough information to drop as SCC.

Hedeoma apiculata
Perityle quinqueflora
Chaetopappa hersheyi
Viola calcicola
Polygala rimulicola var. *rimulicola*

The above 5 species are all cliff or rock dwellers and all occur in deep, rocky canyons in the southern end of the Guadalupe Mountains in NM. The habitats are very naturally protected in these deep canyons. However, the cliff-dwelling habitats in this section of the Guadalupe Mountains constitutes a rare plant community – a rare natural area within NM. These 5 species ONLY occur in this section of the Guadalupe Mountains within NM and, therefore, serve as indicators of this rare cliff-rock community in New Mexico.

Penstemon alamosensis – there are few, but large, populations; a decline in this species may indicate deterioration in some more or less undisturbed plant communities on the west side of the Sacramento Mountains

Valeriana texana – this species is very protected as it is a cliff dweller, but prefers, moist, shaded habitat. It occurs in the Sacramento Mountains and the southern end of the Guadalupe Mountains within NM. Because it prefers moist and shaded habitats, it could serve as an indicator of how rare plants are surviving as a result of drought and the expected warming from climate change.

Table 173. This is the list of species Lincoln NF is proposing as Species of Conservation Concern (SCC) in their revised Forest Management Plan. I agree with most of the entries. However, I recommend that the following species be DROPPED from the proposed list:

Hedeoma pulcherrima - appears rather widespread with 59 SEINet records
Eriogonum wootonii – way too common and widespread
Delphinium novomexicanum – too widespread - 59 SEINet records
Crataegus wootoniana – 64 SEINet records – known from Gila as well as Lincoln NF. Widespread.

RECOMMENDED TO BE UPGRADED TO NM STATE ENDANGERED LIST

Synthyris oblongifolia (*Besseya oblongifolia*) – SEINet records seem to indicate that this species is known from around Lookout Mountain just below Sierra Blanca Peak and the area around Sierra Blanca peak itself. I have personally observed the area around Lookout Mountain this year. It has been completely hammered by elk and possibly also livestock. A lady at Ski Apache indicated around 65 elk around Lookout Mountain the morning I was there. It is clear that during times of winter-time drought, only the highest areas on Sierra Blanca get a decent snow cover. The snow melt provides the only green forage in spring and summer for elk and other grazers. Therefore, the impending effects of drought and warming as a result of climate change seriously endangers this species.

Notes on Lincoln NF Rare Plants Lincoln NF Revised Forest Mgmt Plan

Epipactis gigantea – I have seen at one site, but it's not in the national forest.

Threat is to the habitat, which is wetlands

Achnatherum curvifolium – habitat is ledges and cliffs. Therefore not a concern

Erigeron rybius – I have collected this species. Assessment says locally abundant

Lorandersonia spathulata – I agree this is locally common. I have seen it and might have collected it

Two *Perityle* species are rock cliff dwellers - I have *staurophylla* – not a conservation concern

Euphorbia brachycera – I have collected this species. It is NOT restricted to the Franklin Mountains and Sacramento Mountains. It is widespread – 177 specimens on SEINet

Astagalus neomexicanus – I have found it – it's common, I think

Lupinus sierra-blancae – common – I've collected it

Ribes mescalerium – also common – I've seen it – might have collected it

Second Outrageous error – *Philadelphus argyrocalyx* - NOT restricted to the Guadalupe Mountains. It's in the Sacramento Mountains. There are only 14 SEINet specimens. I have collected it. There is not enough information to put this species off the list. This species should be retained as a species of concern

Nama xylopodum – rock dweller – fairly widespread (SEINet). Probably safe as habitat is cliffs and rock crevices. Do not retain

Hedeoma apiculata – retain – rare endemic, cliff dweller. Retain

Salvia summa – on NMRPTC list – but habitat (cliffs is safe) Do not retain

Polygala rimulicola var. *rimulicola* RETAIN as SCC – very restricted distribution, though cliff-dwelling habitat protects it

Penstemon alamosensis – few large populations. RETAIN on SCC. ON NMRPTC list.

SCC status helps protect the habitats where this species occurs

Valeriana texana – RETAIN as SCC. Limited distribution, though habitat (cliffs, Boulders in creeks is reasonably protected from threats

Viola calcicola – RETAIN as SCC. Very limited distribution in NM. Only 7 SEINet records. Part of rare cliff-dwelling community

Chaetopappa hersheyi – relatively abundant in places. Cliff-dweller. RETAIN as SCC because of rarity of this cliff-dwelling habitat in the southern end of the Guads

Perityle quinqueflora – Retain as SCC because of rarity of habitat and narrow distribution

From the Table 173 Proposed List of Species of Concern I recommend DROPPING:

Hedeoma pulcherrima – appears rather widespread with 59 SEINet records

Physaria lata – unclear if distinct from *P. pinetorum*. If it is distinct then it should probably be protected as an SCC. If it is a synonym, it ought to be dropped as an SCC

Eriogonum wootonii – way too common and widespread

Delphinium novomexicanum – too widespread - 59 SEINet records

Crataegus wootoniana – 64 SEINet records – know from Gila as well as Lincoln NF.

Widespread

NOTE: *Besseyia oblongifolia* is very seriously threatened because of elk and livestock activity and recreational use around Ski Apache and Lookout mountain

