



**Native Plant Society of New Mexico**  
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Planning Team  
Carson National Forest  
208 Cruz Alta Rd.  
Taos, NM 87151

Nov. 7, 2019

Dear Planning Team:

The Native Plant Society of New Mexico (NPSNM), with seven chapters statewide and in El Paso, is grateful for the opportunity to comment on the draft environmental impact statement (DEIS) and draft management plan (DMP or Plan) for the Carson National Forest, released this past August.

1. First of all, we recommend that Carson NF employ a Forest Botanist. 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 Carson National Forest, which covers seven ranger districts over a broad swath of northern New Mexico.

Wildlife biologists, foresters, and range scientists have been contributing necessary botanical guidance in the absence of botanists, as those professionals have taken botany classes during their agriculture school training. But to satisfy the directive to use "best available science," plant science should not all be coming through the agricultural lens but be informed and balanced with hopefully objective data from a botanist. This recommendation is of overriding importance to fill baseline and monitoring data gaps, inject greater awareness of invasive plant species, and implement the new Plan.

2. NPSNM supports the designation of the Wetland Jewels Management Area (WJMA) as included in Alternative 4. In addition to the wildlife and hydrologic values for which these areas were identified, they would also protect rare and important plant species and communities. However, the failure of the DEIS to include analyses of a proposed WJMA is an alarming suggestion that the Forest is not taking this proposal seriously. We request that the final EIS include detailed analysis of the WJMA impacts and benefits, and that such a management area, including wetlands in the San Antonio Management area, be adopted into the final Plan.

3. Please add the New Mexico Rare Plant Conservation Strategy to the list of sources of information for wildlife, fish and plants in Appendix C of the draft Plan. It is available through:

[http://www.emnrd.state.nm.us/SFD/documentsNMRarePlantConsStrategy\\_Final\\_reduced.pdf](http://www.emnrd.state.nm.us/SFD/documentsNMRarePlantConsStrategy_Final_reduced.pdf)

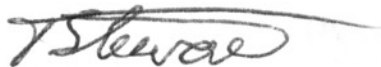
4. We recommend that the Valle Vidal roadless areas with exceptional wilderness characteristics be included in the final revised Plan as recommended wilderness to the full extent included in alternative 5. Decreasing habitat fragmentation in this way maintains a more fully functioning ecosystem and a large genetic reserve of plants and animals alike — so important as environmental stressors increasingly impact many species.

5. It is hard to understand why the DMP does not recommend any additions to the north Pecos Wilderness. We request that all eligible roadless areas that are contiguous with the existing Pecos Wilderness boundary, as indicated in alternative 5, be designated recommended wilderness in the final Plan.

6. We are glad to see among the Sustainable Rangelands and Livestock Grazing Guidelines (FW-GRZ-G) number 8, “Permit conversions to domestic sheep or goats should not be allowed within bighorn sheep occupied habitat to mitigate the potential transfer of disease from domestic sheep to bighorn sheep.” Besides protecting the health of bighorn sheep, we have a concern for the rare and sensitive plant species at the southern end of their range, especially in the Carson’s alpine habitat. Native bighorns are in equilibrium with the native vegetation with which they have coexisted for millennia. The introduction of domestic sheep and goats not only increases herbivory pressure quantitatively, but adds the possibility of livestock choosing different native plant species that are not adapted to browsing. Similarly, we favor the Livestock Grazing Standard (FW-GRZ-S) in alternative 4 on this issue, that domestic sheep grazing allotments shall not be authorized within known bighorn sheep habitat.

Thank you again for this opportunity to comment. We do appreciate the years of work the Forest Service has put into this plan revision process.

Best regards,

A handwritten signature in black ink that reads "Tom Stewart". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tom Stewart  
State Board President  
Native Plant Society of New Mexico

Stewart