



Native Plant Society of New Mexico
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Albuquerque, NM 87176-5388

Ms. Jennifer Cramer
Forest Planner
Santa Fe National Forest
11 Forest Lane
Santa Fe, NM 87508

Nov. 7, 2019

Dear Ms. Cramer,

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 revised management plan (Plan) for the Santa Fe National Forest that were released this past August.

1. We recommend that SFNF employ a Forest botanist. Whether you look at technical definitions or common understanding, the dominant feature of a forest is the plant communities it comprises and the ecosystem services they provide. It stands to reason that there should be at least one qualified botany professional on the staff of Santa Fe National Forest, which covers five ranger districts over two mountain ranges. To satisfy the directive to use "best available science," plant science should not all be coming through an 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, and implement the new Plan.

2. NPSNM supports the designation of additional management areas as described in Alternative 3 of the Draft EIS. In particular, the Wetland Jewels, Calaveras and Holy Ghost Canyon Management Areas will protect valuable species and vegetation communities.

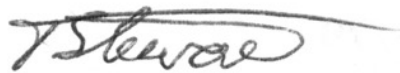
In general, the current draft gives short shrift to rare and sensitive plant species that are in the custody of the Forest Service. Only one federally endangered plant is listed in the SFNF, the Holy Ghost Ipomopsis (*Ipomopsis santi-spiritus*, HGI), and so it is a showcase of the Forest's management capability. Loss of this one species, which is publicly visible due to the popularity of Holy Ghost Canyon for recreation, would frankly be an embarrassment to Forest planners and management, not to mention a tragedy to biodiversity. This underscores the need for the canyon to be designated as a special management area or research natural area, following a plan for recovery in collaboration with the existing HGI Recovery Working Group convened by the US Fish and Wildlife Service.

3. Thank you for including the following guideline for managing forest thinning debris: “Burn pile composition should contain a mixture of fuel sizes. Large woody fuels, over 8.9 inches in diameter, should be limited to less than 40 percent of the composition of the pile to prevent adverse impacts to the soil”, which is incorporated into Alternatives 2, 3 and 4. Risk mitigation practices for such treatments should also include pre- and post-project weed surveys and corrective action as needed. The intense heat of burn piles inactivates many native seeds in the soil bank to the benefit of fire-adapted invasive species. Mastication and scattering of slash is preferable to burn piles whenever practical.

4. While the modest amount of recommended wilderness designations in the preferred alternative 2 are welcome, we urge the addition of some key areas that are sensibly highlighted in alternative 3. These include the 5805 acres in West San Pedro Parks, the 10,157 acres of Ortiz Mountain, the 19,258 acres in White Rock Canyon, and roadless areas contiguous with the current Pecos Wilderness. Ensuring decreased habitat fragmentation in this way maintains a more fully functioning ecosystem and a genetic reserve of plants and animals alike. This becomes increasingly important as climate change exerts more pressure on all species.

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, appearing to read "T Stewart", with a long, sweeping horizontal line extending to the right.

Tom Stewart
State Board President
Native Plant Society of New Mexico