

Native Plant Society of New Mexico
PO Box 35388
Albuquerque, NM 87176-5388

Adam Medonca, Forest Supervisor
Gila National Forest

April 15, 2020

Re: Draft Revised Forest Plan and Draft Environmental Impact Statement

Dear Mr. Medonca:

The Native Plant Society of New Mexico respectfully submits the following comments in response to the above referenced documents. NPSNM is a non-profit organization with more than 700 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.

Thank you for preparing a Draft Revised Forest Plan which utilizes up-to-date research on climate, fire and forest structure. The consideration given to ecosystem services and historic range of variability provides a sound foundation for planning, while explicitly recognizing the inherent limitations of state-and-transition models (no accounting for climate change or herbivory, lack of spatial reference). The Draft Revised Plan is clearly written and includes a thorough explanation of some complex ecological concepts.

Botanical Areas

NPSNM appreciates that the Forest has included the special Botanical Management Areas proposed by the Gila Native Plant Society in the Draft Revised Plan. The original areas proposed, respectively, for the Mogollon, Pinos Altos, and Emory Peak Botanical Areas were 163,009 acres, 155,021 acres, and 52,850 acres. Forest staff then requested that the proposals be reduced to below 100,000 acres each, in order to qualify for what they see as a more efficient designation process. In response, the GNPS submitted a proposal that reduced the size of the BAs by 41%-86%, which proposal was adopted in the Draft Plan EIS Alternative 5. The BAs proposed in the Draft Plan EIS Alternative 2, the Proposed Action, have been further reduced by 46%-70%. The Forest has indicated, in the EIS and to GNPS, that the additional reductions were made in order to facilitate border identification, avoid including any private lands, and avoid Wildland-Urban Interface, where large-scale vegetation treatments may be necessary to protect human lives and property. While we have not examined the maps, it seems unlikely that such large reductions could have been necessary to achieve the stated purposes. We request that the Gila NF provide detailed justification for the additional reductions in size of the proposed BAs, and if they cannot do so, to adopt the boundaries proposed in Alternative 5.

The proposed specifications for management of the BAs (Draft Plan p. 238-239) are insufficient for the purpose for which the BAs would be designated. We have drafted a more appropriate set of Desired Conditions, Objectives, Standards and Guidelines (attached). In particular, we propose a more focused Desired Condition, stipulate that temporary motorized routes through

the BAs will be restored after closure, when they are no longer needed, and we upgrade the motorized route maintenance specification from a Guideline to a Standard.

Monitoring for Adaptive Management

Although the Draft Plan is based on an impressive analysis of current knowledge regarding fire ecology and projected climate change, there is much about the future that can't be known at this time. The Forest monitoring plan must focus on collecting data needed in order to manage for resiliency in the face of climate change. Towards that end, we recommend that the second part Q40 ("Have recommended BMPs been implemented? Are recommended BMPs effective?") be elevated from a potential question to be answered if resources allow, to the set of Minimum Required Monitoring, in particular regarding ecological restoration projects, to include Burned Area Emergency Response actions. In addition, a monitoring question should be added to record the detailed trajectory of the natural recovery of burned areas. The Gila has experienced a number of unprecedented large fires in the past two decades, and information about natural recovery processes will be invaluable to prioritize response actions.

Secondly, Q68 ("What is the status and trend of invasive and noxious plant species?") should also be part of Minimum Required Monitoring. While we have no reason to believe that weeds are a major problem on the Gila at this time, early warning through targeted surveillance will be crucial to successfully addressing weed problems should they occur due to changing conditions.

Finally, we note that Q70 ("What is the status and trend of rare plants across the forest?") has been assigned relatively low priority, presumably because of the large effort required to collect such information. Plant diversity and endemism is an important component of what makes the Gila special, so we encourage the Forest to actively pursue collaborations and funding to make those efforts possible.

Herbicide Use Plan

Please add to the project design criteria for herbicide use (starting on page 8 of the Draft Plan), a criterion stating that use of herbicides which may adversely impact rare and endemic plants will be avoided Forest-wide, not just in the Botanical Areas, and that, where such treatment is necessary to control noxious weeds, a mitigation plan will be developed.

Sincerely,

Rachel Jankowitz, Conservation Chair
Native Plant Society of New Mexico

Attachment:

The three areas are:

Emory Pass – 31,150 acres

Mogollon Mtns – 98,510 acres

Pinos Altos Mtns – 20,930 acres

Desired Conditions

Sustain populations of and minimize negative impacts to rare and endemic flora including but not limited to FS Species of Conservation Concern. See also the Rare and Endemic Plant Species and Habitats section.

Objectives

Maintain suitable habitat conditions including unique features (topographic, etc) of particular rare plant species habitats.

Implement land and visitor management that includes considerations for maintaining populations and minimizing negative impacts to targeted flora and associated habitat.

Standards

New motorized routes will not be constructed, except for temporary routes. These routes will be closed and restored when no longer needed.

The use of herbicides which may have activity on rare and endemic plant species will not occur unless it is to control or eradicate noxious weed species, and other integrated pest management efforts have failed or are unlikely to succeed.

Maintenance of existing motorized routes will avoid ground disturbance outside of the existing road prism and associated drainage features.

Guidelines

Plan and conduct all uses and activities in a manner which is in harmony with the purpose for which the Rare and Endemic Plant Management Areas were designated.

Maximize opportunities for visitor engagement, research, education and promote values of unique plant populations.

See also the Livestock and Non-native Invasive Species sections for certified weed-free materials Plan direction.