Comments by the Native Plant Society of New Mexico
on the Draft 2020 Forest Action Plan of the Forestry Division of
the New Mexico Department of Energy, Minerals and Natural Resources

May 28, 2020

This comment is submitted on behalf of the Native Plant Society of New Mexico (NPSNM), a non-profit organization with close to 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.

We thank you for this opportunity to comment on the draft Forest Action Plan (FAP) for 2020. The intent to provide a framework for science and fact based decision making is commendable, and we appreciate the collaborative approach to forest stewardship. We agree strongly with the statement of need for the use of genetically diverse, locally appropriate seed and seedling stock for revegetation, and the promotion of in-state nurseries (strategy 6). However, in sub-strategy 6.1.C, please reference the Institute for Applied Ecology (Southwest Office, Santa Fe) which already has an active seed collection program underway and a great deal of knowledge to share in this area.

Our primary concerns are the unfortunately limited and single time given for making comments and for the cursory treatment given to Strategy #5, Rare Plant Conservation. Three years ahead of the FAP due date, the State Botanist, along with stakeholders not included in developing this draft FAP, developed the Rare Plant Conservation Strategy (RPCS) for inclusion in the 2020 FAP. An amplification of what that Strategy involves is necessary for such a highly important natural resource. Mere reference to the Strategy as included in this draft may cause inattention and lack of guidance to persons or organizations the FAP is addressed to. The two sentence RPCS description stands in stark contrast to the detailed and well-presented Reforestation Strategy.

The statement in the general description of the FAP Strategies that actions in the RPC Strategy are integrated throughout the FAP does not appear to be the case. The RPCS should be incorporated into the other relevant FAP sub-strategies such

as outreach, staff training, education and desired outcomes.

For example, under sub-strategy 1.6, improved rare plant habitat should be included under Outcomes, which should also include identifying suitable reintroduction sites.

Under Strategy #2 Fire Management, Firefighters should be trained to determine whether rare or endangered plants may be affected by wildfires and such plants should be identified to the firefighters so that equipment or other measures avoid them to the extent possible. Post-fire reviews on the status and mitigation measures for those plants should be conducted.

Inclusion of the RPCS should not be considered an added obligation but an asset to other desired outcomes and strategies.

For instance, under Strategy # 9, Land Conservation, identification of priority areas for conservation and "biodiversity hotspots" is an obviously appropriate application of the Rare Plant Strategy, which is also guidance for suitable reintroduction sites for rare and endangered plants and a tool for all the sub-strategies of #9. For instance, sub-strategy 9.3A is to "provide guidance to landowners who are land-rich and cash-poor in obtaining conservation easements." The presence of rare plants can provide a firm basis of eligibility for certain landowners.

Under Strategy # 10, Outdoor Recreation, a sub-strategy should be added that would minimize risks to rare and endangered plants located near recreational facilities. An action item should include measures such as road improvements with bollards, pullouts, campground limits and the like. A diversity of plant life in general increases the attractiveness of areas for recreation, the abundance of wildlife, suitability for traditional uses and the health of the forest. Plants, not exclusively trees, are not just a quantitative resource but a qualitative one.

Short shrift is unfortunately given to the threat of invasive species in the FAP, as invasives are just as big a risk to forests as is disease or insect damage. Candidate areas for treatments, especially prescribed fire, should be surveyed for invasive species both before and after treatment. It is well known that opening up forests to sunlight and lowering understory competition invites infestation with exotic weeds whose seeds may be present. Some of these species are fire-resistant,

create fuels, and can permanently alter the fire regime. They may also degrade grazing quality and wildlife habitat.

It is great that in sub-strategy 3.5, the FAP intends that “Sensitive plants, animals, and their habitats are maintained and enhanced” in managing private lands and advises working with the State Botanist and others to design appropriate projects.

But when the FAP calls for the use of professional resources, relevant science, and drawing upon science-based institutions (strategies 1, 9, and others), the State Botanist is not mentioned. The Native Plant Society of New Mexico believes that our state deserves a professional botanist on staff and the position of State Botanist needs to become a permanent, regular EMNRD position. As of now, the Botanist must depend on soft money from the Fish and Wildlife Service, the uncertainty of which presents an unacceptable risk to our natural heritage.

Sincerely,

Tom Stewart
Board President,
NPSNM