



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

Travis G. Moseley, Supervisor, Lincoln National Forest

November 4, 2020

Re: Draft Environmental Impact Statement for Non-native Invasive Plant Management

Dear Mr. Moseley:

Thank you for this opportunity to comment on the above referenced document. 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.

NPSNM supports the preferred alternative as drafted. The plan recognizes the need for cross-boundary coordination and includes adequate Resource Protection Measures and an explicit adaptive management strategy. We encourage the Forest to consider how best to administratively integrate NNIP management into operational programs, such that the principles of prevention, early detection and rapid response will get sufficient emphasis in project development, as resources and priorities fluctuate over time. In order to leverage limited resources, there should be integration of NNIP surveillance with other forest programs so that all staff, as well as grazing lessees and other Forest users, are utilized to detect and report infestations observed in the course of their customary activities. Any outreach or educational materials disseminated for that purpose must emphasize the distinction between invasive thistle species and natives. NPSNM has published a guide to thistle identification, available on line at <https://www.npsnm.org/plant-id-collection/>.

On the subject of native thistles, the Wright's marsh thistle has recently been proposed by the US Fish & Wildlife Service for listing as Threatened under the Endangered Species Act. Species status will unavoidably change over the life of any planning document, but the Final EIS should be updated to reflect the current listing status at the time of the Record of Decision.

Sincerely,

Rachel Jankowitz, Conservation Chair
Native Plant Society of New Mexico