



Native Plant Society of New Mexico

P. O. Box 35388

Albuquerque, NM 87176-5388

February 7, 2022

Re: Opportunity to Hire Forest Botanists

Dear Forest Supervisors:

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.

We are writing to recommend that the USFS use a portion of newly available funding to employ a botanist for each Forest. This recommendation is of overriding importance to future management and implementation of the new Forest Land and Management Plans. The dominant feature of a forest or grassland is the plant communities it comprises. We urge you not to neglect the plants that make it all possible.

Currently in NM, only the Lincoln NF and the Regional Office based in Albuquerque employ a botanist. A 2009 nation-wide survey by Botanic Gardens Conservation International US (BGCI) revealed severe shortages of botanists at government agencies, a wave of upcoming retirements, and (in response to the poor job market) an alarming decline in botanical degree programs and course offerings at the nation's colleges and universities. If this situation does not change, opportunities to solve environmental challenges will be lost, and our public and private lands will continue to degrade. At minimum, there should be one full-time botanist with appropriate training on staff at all regional and Forest offices. BCGI specifically recommended that all new federal botanist hires should be employed under the US Office of Personnel Management employment code 0430 (Botany), rather than the more general code of 0400 (Natural resource management / general biology), as it does not effectively capture required botanical expertise.

The 2020 Great American Outdoors Act authorizes funding under the Legacy Restoration Fund annually through the fiscal year 2025. According to a USDA press release dated 3/8/21, Forest Service economists estimate that projects funded with these dollars will support roughly 4,400 jobs. The U.S. Department of Agriculture will invest \$285 million to help the Forest Service address critical deferred maintenance and improve transportation

and recreation infrastructure. This Fund will be used to facilitate natural carbon capture, promote public-private partnerships, tourism and recreation, protect public lands, and ensure our national forests are accessible to all by improving recreation facilities, visitor centers, dams and trails. Other projects aim to increase public access by restoring and repairing roads, bridges, tunnels and parking areas. These investments will also serve as a catalyst for rural economic development and employment opportunities.

The Infrastructure Investment and Jobs Act of 2021 invests about \$5.5 billion in lands and resources entrusted to the care of the USFS. The new funding will let USFS improve wildland fire management and repair infrastructure, both nature-based and constructed. According to the public message from Chief Randy Moore, dated 11/15/21, about \$3 billion of that amount will be invested over five years to reduce the risk of wildland fire and restore ecosystems. Chief Moore intends to invest in your workforce by creating a new occupational series for wildland firefighters, and allocate additional funding to repair trails, restore fish passage and decommission legacy roads.

Recent proposed amendments to the New Mexico Endangered Plant Species List and Collection Permits Rule (19.2.1 NMAC), when signed by the Secretary of the Energy, Minerals & Natural Resource Department, will require the USFS to obtain a state permit for the taking of state-listed endangered plants (including those which are also listed by the federal Fish & Wildlife Service). The definition of “take” will be amended to include “remove, harm, kill, destroy” in addition to “possess, transport, export, sell, or offer for sale any of the plants, or parts thereof, listed in 19.21.2.9 NMAC, from the places in the state of New Mexico where they naturally grow.”

Most of the on-the-ground projects described above will require environmental clearances to avoid or mitigate impacts to rare plant species and important plant communities, manage non-native invasive weeds, obtain state permits where needed, and conduct monitoring and adaptive management into the future.

In addition to ensuring that infrastructure projects can proceed in a timely manner, with net positive environmental impact, botanical expertise is needed to implement the recently revised Forest Plans by all five NM National Forests. The Needs Assessments completed for each Forest under the 2012 Planning Rule identified existing data gaps (inadequate, missing or obsolete information) in the areas of riparian condition assessments, special status species occurrence and distribution, non-native invasive weed surveys, and terrestrial vegetative community condition.

Thank you for your attention to this critically important matter.

Sincerely,

Rachel Jankowitz, Conservation Chair
Native Plant Society of New Mexico