

State of New Mexico  
Energy, Minerals and Natural Resources Department

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**Susana Martinez**  
Governor

**Ken McQueen**  
Cabinet Secretary

**Matthias Sayer**  
Deputy Cabinet Secretary

**Donald Griego, Acting**  
Division Director  
State Forestry Division



**March 20, 2017**

**RE: New Mexico Meadow Jumping Mouse Habitat Improvement Projects on the Sacramento Grazing Allotment of the Lincoln National Forest**

Dear Elizabeth Humphrey:

Thank you providing me with the opportunity to review and comment on the proposed New Mexico Meadow Jumping Mouse Habitat Improvement projects on the Sacramento Grazing Allotment of the Lincoln National Forest. Any environmental analysis of the project impacts will have to include analysis of endangered and sensitive plant species, especially the Sacramento Mountains thistle (*Cirsium vinaceum*), which is known to occur within your project sites. I have the following comments and recommendations regarding these projects:

I highly recommend surveys in all project areas (including livestock handling facilities, water developments, and an appropriate buffer to include the zone of potential influence) for sensitive and endangered plants, including the federally and state listed Sacramento Mountains thistle. The Sacramento Mountains thistle is known to occur in wetlands throughout the Rio Penasco and Wills Canyon drainages and is documented within several of your project sites. If endangered or sensitive plants are found they should be avoided during any ground disturbing activities associated with this project. If this is not possible, appropriate mitigation measures should be implemented to minimize impacts to any sensitive or endangered plants found in the project area. A biological monitor should be on site during construction activities in all areas where sensitive and endangered plants are located within 200 feet of the construction perimeter.

Various sources have documented that the Sacramento Mountains thistle has been seriously impacted by habitat alteration and grazing in their limited habitat on the Sacramento Ranger District, which is the only place where this species occurs in the world. Grazing has been documented to significantly contribute to the decline of this species. Therefore, it is likely that the planned exclosures will have a positive impact on the Sacramento Mountains thistle. Inclusion of all existing thistle populations should be considered in the planning of fence boundaries. If not all plants can be fenced, monitoring of plants outside the fenced areas needs to be considered to monitor livestock impacts in response to redirecting livestock to other areas. Populations within the project areas should be closely monitored to document changes in population trends, in response to the proposed changes in management. In addition, the Forest Service should consider evaluating the feasibility of planting Sacramento Mountains thistle inside the exclosures, or augmenting existing populations, thereby contributing to the recovery of the species from the endangered species list.

Sincerely,

A handwritten signature in blue ink that reads "Daniela Roth". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Daniela Roth  
Botany Program Coordinator