

State of New Mexico
Energy, Minerals and Natural Resources Department

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October 21, 2020

Travis Moseley
Lincoln National Forest Supervisor
3463 Las Palomas
Alamogordo, NM 88310

Dear Mr. Moseley:

Thank you for providing me with the opportunity to review and comment on the Integrated Non-Native Invasive Plant Management Project Draft Environmental Impact Statement for the Lincoln National Forest in Eddy, Chaves, Lincoln, and Otero counties, NM. The Endangered Plant Program of the Forestry Division supports the selection of alternative B of the Integrated Non-Native Invasive Plant Management Project, based on the implementation of the resource protection measures described in the DEIS Appendix D. I have a few technical comments that largely refer to outdated information used in the effects analysis.

Effects to Federally-listed and Sensitive Plant Species

Please update your list of federally listed endangered plant species to reflect current classifications:

- *Echinocereus fendleri* var. *kuenzleri* is listed threatened, not endangered (Page 100).
- *Cirsium wrightii* is proposed threatened with proposed Critical Habitat in the Lincoln National Forest and therefore needs to be analyzed accordingly (p. 109).

Sensitive Species

Please make the following corrections or additions:

- Update the name of Guadalupe mescal bean (*Sophora gypsophila* var. *guadalupensis*). This is no longer an accepted name. The current accepted name is *Dermatophyllum guadalupense*. The Candidate Conservation Agreement for Goodding's onion (*Allium gooddingii*) expired in 2007 (p.106).
- A significant number of known *Astragalus kerrii* sites burned in the 2004 Peppin Fire. Please provide current information (p. 107; Worthington 2007).

Sincerely,

A handwritten signature in dark ink that reads "Daniela Roth". The signature is fluid and cursive, with the first name being more prominent.

Daniela Roth
Endangered Plant Program Coordinator

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