



**DEPARTMENT OF AGRICULTURE
STATE OF NEW MEXICO**

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MICHELLE LUJAN GRISHAM
Governor

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Secretary

November 23, 2020

Mr. Travis G. Moseley, Forest Supervisor
c/o Peggy Luensmann
Lincoln National Forest
3463 Las Palomas Road
Alamogordo, NM

Dear Mr. Moseley:

New Mexico Department of Agriculture (NMDA) submits the following comments in response to the Lincoln National Forest's (LNF) Integrated Non-Native Invasive Plant Management Project Draft Environmental Impact Statement (DEIS).

Part of NMDA's role is to advocate on behalf of New Mexico's agricultural communities and the natural resources that sustain them. NMDA supports the management of National Forest System lands under the principles of multiple-use and sustained yield as congressionally mandated by the Multiple-Use and Sustained-Yield Act of 1960 (16 U.S.C. 528-531) and further codified by the National Forest Management Act of 1976 (16 U.S.C. 1601-1614). Livestock grazing on lands managed by the LNF forms the economic foundation of many rural communities in southeastern New Mexico. The livelihoods of local producers depend on proactive and science-based range resource management.

As New Mexico's coordinating agency for the management of noxious and invasive plants, NMDA supports the Proposed Action as the most effective treatment option

The Proposed Action (Alternative B) provides the best chance at achieving the Purpose and Need for Action by authorizing the broadest set of tools for managing noxious and invasive species. NMDA concurs with LNF that Alternative B is also the most effective for maintaining native forage production for livestock and wildlife. Herbicides are an essential tool for cost-effective integrated weed management (IWM) and offer one of the few practical options for killing rhizomatous plants and suppressing seed banks, which are key to long-term invasive species reduction. The Proposed Action's adaptive approach for incorporating new herbicides and treatment options will streamline the adoption of the most up-to-date IWM strategies.

The LNF should focus on increasing inventory and monitoring

As acknowledged in the DEIS, inventory and monitoring are central to early detection and rapid response. The DEIS states the increase in infested acreage is partially due to “improved methods for survey and inventory” (pages 4 and 98), but it provides no more detail on the current status and strategy for monitoring. To effectively allocate resources, LNF should develop systematic objectives and concrete metrics for mapping infestations as a component of its IWM effort.

In addition, the current mapping of species could be presented more clearly in the DEIS. On pages 8-10 of the DEIS, the maps of known infestations in the LNF are difficult to decipher due to the scale and color scheme. To more clearly illustrate the existing inventory of invasive species, the final Environmental Impact Statement (FEIS) should provide separate maps in an appendix for the known infestations of each species.

NMDA requests that LNF update the DEIS using the 2020 New Mexico Noxious Weed List

In July NMDA released the most recent New Mexico Noxious Weed List update (see attachment). The LNF should review the updated list and make appropriate changes to Chapter 1, Chapter 3, and Appendix A of the FEIS. For example, Russian knapweed has been reclassified from a Class B to Class C species and yellow bluestem is now a watchlist species.

NMDA appreciates the ability to participate in the Lincoln National Forest’s public comment process. If you have any questions related to these comments, please contact Mr. Max Henkels at (575) 339-5052 or mhenkels@nmda.nmsu.edu.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JM Witte', with a stylized flourish at the end.

Jeff M. Witte

JMW/mh/ya

Attachment