



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

Travis G. Moseley, Supervisor  
Lincoln National Forest

November 5, 2021

Re: Draft Environmental Impact Statement (DEIS) and Draft Land Management Plan (DLMP)

Dear Mr. Moseley:

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

1. At-Risk Species (ARS) List. The DLMP divides at-risk species into two categories, those listed under the federal Endangered Species Act (ESA) as endangered, threatened, proposed or candidate, and Forest Service Regional Species of Conservation Concern (SCC) which are known to occur on the Forest. Tables 3-45 and 3-46 of the DEIS show 10 ESA species, of which 6 are plants, and 46 SCC, of which 25 are plants. Appendix A of the DEIS - Documentation of the Analyses of At-Risk Species, lists 9 ESA species, including the 6 plants, and 45 SCC, including 31 plants. These discrepancies are small compared to the difference between the DEIS and the DLMP, which, on page 71, states that 79 ARS were identified, of which 20 are federally recognized. Instead of differentiating between animals and plants, the reader is directed to Appendix A for a list of species. Thus, it is impossible to know what exactly is on the Lincoln NF ARS list. The analysis consists of a list of potential generic threats to ARS but there is no discussion of threats to any particular species. Unless the DLMP figures are simply incorrect, these discrepancies suggest that no analysis at all was conducted regarding the 11 ESA species and 15 SCC which are not in the DEIS Appendix A.

**Comment:** The Final EIS must show an unambiguous current list of at-risk species. Presumably, the list will evolve over the life of the plan as ESA and SCC listings change. An up-to-date ARS list must be available to Forest staff and the public at all times.

**Comment:** The analysis of ARS threats should identify which potential threats are associated with which species.

2. At-Risk Species Protections. One of the two proposed DLMP standards for ARS says: *"Where the Forest Service has entered into signed conservation agreements that provide guidance on activities or actions to be carried out by Lincoln National Forest staff, those activities or actions must be undertaken consistent with the guidance found within those conservation agreements."* We would like to believe that the Forest Service would always implicitly commit to honoring signed agreements. However, the example

of Goodding's onion (*Allium gooddingii*), a Forest SCC, suggests otherwise. A Goodding's Onion Conservation Agreement was signed between the Forest Service and US Fish & Wildlife Service in 1997, with a term of 10 years. A review by researchers associated with the University of Arizona found that two other National Forests failed to implement the Agreement. Though biologists recorded the potential presence of the species in many project-specific environmental evaluations, there was no evidence that project sites were surveyed or that any projects or allotment plans were amended as a result. It appears that the same situation obtained on the Lincoln NF.

Goodding's onion does poorly after high-intensity wildfire, and 95% of all known sites in both NM and AZ have burned between 2006 and 2021. In the Lincoln NF, the 2012 Little Bear Fire burned Goodding's onion populations. In 2020, surveys found that the remaining plants had since been significantly impacted by ski area maintenance, post-fire restoration activities, hazard tree removal, and tree removal associated with a bark beetle outbreak. The largest population on the Lincoln NF was burned in the 2021 Three Rivers Fire, and its condition has not yet been assessed.

The other proposed Standard for ARS pertains only to ESA species with federally designated Critical Habitat.

**Comment:** Elevate proposed ARS Guideline 01 to a Standard: *"All authorized activities should be designed and implemented to address and mitigate threats to at-risk species and their habitats."* Further revise this Standard to specify that all project-level environmental evaluations will assess the potential presence of ARS, require site surveys if applicable, archive survey results, and specify actions that will be taken if at-risk plants are present to minimize or eliminate impacts.

3. Monitoring program. Chapter 4 of the DLMP – Land Management Plan Monitoring, states that "[t]he plan-level monitoring program is informed by the assessment report developed concurrently with plan development, and implemented after plan adoption." Table 3 (which, to be consistent with the rest of the Plan, should be labeled Table 4-1) lays out several monitoring questions, the indicators which will be used to address those questions, and the frequency with which each indicator will be evaluated. However, as we noted in our November 2020 comment letter on the Draft Assessment of Sustainability Conditions and Trends, the ability of land managers to influence Forest conditions toward a desired state is undermined by a lack of information documenting current conditions. Areas where the Draft Assessment report indicated inadequate or obsolete data include: invasive weeds, riparian condition, and terrestrial vegetation communities.

**Comment:** The new Forest Plan would be an appropriate venue to identify and prioritize existing data gaps.

**Comment:** The Forest should be realistic about resources that are reasonably expected to be available for monitoring, and design a strategy to fill critical baseline data gaps, and to prioritize or make adjustments if resources do not allow all of the activities detailed in Table 3 to proceed as scheduled.

Sincerely,

Rachel Jankowitz, Conservation Chair  
Native Plant Society of New Mexico

## References:

Laurenzi, A. and J. Anderson, 2011. Research on Threatened and Endangered Plants in Arizona, Goodding's Onion (*Allium gooddingii*) Conservation Agreement: The First Ten Years, A Formal Review. Unpublished report prepared for the Arizona Department of Agriculture and the U.S. Fish & Wildlife Service, Region 2.

Roth, D., 2020. Status report. Goodding's onion (*Allium gooddingii*). Gila and Lincoln National Forest, New Mexico. Unpublished report prepared for the U.S. Fish & Wildlife Service, Region 2, Albuquerque, NM. NM Energy, Minerals & Natural Resources Department – Forestry Division.

Roth, D., 2021. Goodding's Onion (*Allium gooddingii*) Status 2021 – Summary. NM Energy, Minerals & Natural Resources Department – Forestry Division.

USDA Forest Service, Southwestern Region and USDI Fish and Wildlife Service, Southwest Region, 1997. Goodding's Onion (*Allium gooddingii*) Conservation Agreement.