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17 September 2024

Plan Revision Team
Gila National Forest
3005 E. Camino del Bosque
Silver City, NM 88061

RE: Revised Gila National Forest Land Management Plan and Final Environmental Impact Statement (EIS); NMERT 3693

Dear Plan Revision Team,

The New Mexico Department of Game and Fish (Department) has reviewed the Final EIS for Amendments to the Gila National Forest Land Management Plan (Plan). The Department appreciates the opportunity to review this Plan and participate as a formal cooperator under the National Environmental Policy Act process. We encourage continuation of the U.S. Forest Service's partnership with cooperating agencies. The Department's recommendations to strengthen measures taken to benefit New Mexico wildlife and their habitat within the National Forest are provided below.

The Department's comments are organized sequentially by page number within the Plan and EIS (including appendices). The Department also reviewed the updated list of Species of Conservation Concern and our recommendations regarding this list are provided at the end of this letter.

Comments

Plan Pages 78-82, EIS Page 179: Ponderosa Pine Forest, Species of Conservation Concern

The report by Johnson et al (2023) (Page 22) states "Approximately two-thirds of survey points with jay detections had ponderosa pine woodland, and nearly 20% had ponderosa pine without recorded piñon-juniper. This is the first area of occurrence in New Mexico where we have found pinyon jays using ponderosa pine woodlands. Nesting colonies found elsewhere in New Mexico were in piñon-juniper woodland or juniper savanna habitats (Johnson et al. 2014, 2015). Ponderosa pines were present at several nesting locations in the Gila NF. In 2023, all 12 active colonies were in sparsely treed or open areas, including in ponderosa pine woodlands, and 64% directly bordered meadows." Given this information, the Department recommends mentioning and considering pinyon jay (*Gymnorhinus cyanocephalus*) use of ponderosa pine habitats in the Gila National Forest, both in the description of Ponderosa Pine Forest management in the Plan (Pages 78-82) and in the description of this species in the EIS (Page 178)

Plan page 113, EIS Page 147: Riparian and Aquatic Ecosystems

Paragraph 4 on page 113 of the Plan and paragraph 3 on page 147 of the EIS state, "...riparian areas on the forest provide essential habitat for wildlife and aquatic species, including federally listed and proposed threatened or endangered species, species of conservation concern, and rare or narrow endemic plants and macroinvertebrates such as snails." However, the EIS states earlier in paragraph 4 of page 128 that "The forest does not have a detailed inventory or assessment of springs and seeps or non-riverine wetlands." Springs and seeps provide crucial habitat for many endemic aquatic species, including the New Mexico hot springsnail (*Pyrgulopsis thermalis*) and the Gila Springsnail (*Pyrgulopsis gilae*), found in the Gila National Forest. Thus, spring and seeps, such as those where endemic species are found, should be inventoried, assessed, and protected.

Plan Pages 129-131: Wildlife, Fish, and Plants

The background information section should provide a link to the full list of Species of Conservation Concern and more detail regarding the criteria used to develop this list. The Department also recommends referencing state-listed species and Species of Greatest Conservation Need (SGCN) identified in the [State Wildlife Action Plan for New Mexico](#) (SWAP) in this section. In the first paragraph on page 130, "Rio Grande trout" are referenced twice; these references should be corrected to "Rio Grande cutthroat trout" (*Oncorhynchus clarkii virginalis*). The statement in the second paragraph on page 130 "The New Mexico Department of Game and Fish is responsible for managing all other wildlife species, including all other protected vertebrates, mollusks, and crustaceans identified in the State Wildlife Action Plan" is incorrect. This sentence should state that the Department is responsible for managing all the state's protected vertebrates, mollusks, and crustaceans as defined in Chapter 17, New Mexico [Statutes Annotated \(NMSA\) 1978](#).

EIS Page 181, EIS Appendix A Pages A182-A184: Focal Species, Northern Goshawk

In 2023, the American Ornithological Society split the northern goshawk (*Accipiter gentilis*) into 2 species: American goshawk (*Accipiter atricapillus*) and Eurasian goshawk (*Accipiter gentilis*); all references to the northern goshawk in all plan and EIS documents, including those detailed here, should be revised to American goshawk. The Department also recommends continued surveys and monitoring of pinyon jays to build on the recent data collected by [Johnson et al. \(2023\)](#).

EIS Page 182: Table 41

In Table 41 in the EIS, the scientific name for desert sucker should be corrected to *Catostomus clarkii*.

Plan Pages 195-196, EIS Appendix A Page A215: Riparian and Aquatic Ecosystems

The Department recommends adding information under the guidelines portion of the Livestock Grazing section of the Plan (Pages 195-196) stating that "livestock grazing management strategies, such as deferred or rotational grazing and resting riparian areas that are severely degraded, should be implemented to promote the proper functioning condition of riparian habitats as outlined in the desired conditions portion of the Riparian and Aquatic Ecosystems section (Pages 115-118) of the Plan".

EIS Page 207: Effects Common to All Action Alternatives

The Department recommends addition of information regarding the key ecological conditions for the Gila trout (*Oncorhynchus gilae*), including cold water temperatures.

Plan Page 256: Eligible Wild and Scenic Rivers

The Department appreciates the inclusion of language clarifying that Wild and Scenic River designation will not prevent the installation of fish barriers intended to restore native fishes in these designated areas.

Updated Species of Conservation Concern List

- ❖ The scientific name for the pinyon jay is misspelled, correct to *Gymnorhinus cyanocephalus*.
- ❖ The scientific name for the lesser long-nosed bat is now accepted as *Leptonycteris yerbabuenae*.

The Department suggests consideration of the following species for addition to the Species of Conservation Concern list. These species are all being proposed as SGCN for the congressionally-mandated 2025 review and revision of the SWAP. Based on available information, the Department believes these species are found within the boundaries of the Gila National Forest but defers to any more detailed information that may be available to the U.S. Forest Service regarding the distributions and local presence of these species.

<u>Common Name</u>	<u>Scientific Name</u>	<u>New Mexico County Intersecting Gila National Forest</u>	<u>BISON-M* Species Booklet</u>	<u>NatureServe Rank</u>
Andrenid Bee	<i>Andrena mimbresensis</i>	Grant	View Booklet	SNR
Andrenid Bee	<i>Andrena neffi</i>	Grant	View Booklet	SNR
Andrenid Bee	<i>Andrena vogleri</i>	Grant	View Booklet	SNR
Beavertail Fairy Shrimp	<i>Thamnocephalus platyurus</i>	Grant	View Booklet	G5/SNR
Burnt Corral Pyrg	<i>Pyrgulopsis similis</i>	Catron	View Booklet	GNR/SNR
Dry Creek Woodlandsnail	<i>Ashmunella tetrodon tetrodon</i>	Catron	View Booklet	T3/S3
False Marsh Slug	<i>Deroceras heterura</i>	Catron, Grant, Sierra	View Booklet	G1/SNR
Jordan Spring Pyrg	<i>Pyrgulopsis marilynae</i>	Catron	View Booklet	GNR/SNR
Monarch	<i>Danaus plexippus</i>	Catron, Grant, Sierra	View Booklet	G4/SNR
Nokomis Great Basin Silverspot	<i>Argynnis nokomis nokomis</i>	Catron, Grant	View Booklet	T1/S1
Pinos Altos Mountainsnail	<i>Oreohelix confragosa</i>	Grant	View Booklet	G2/S1
Sonoran Snaggleteeth Snail	<i>Gastrocopta prototypus</i>	Catron, Grant	View Booklet	G1/SNR
Subalpine Mountainsnail	<i>Oreohelix subrudis</i>	Catron, Grant, Sierra	View Booklet	G5/S3
Vertigo Snail	<i>Vertigo concinnula</i>	Catron, Grant, Sierra	View Booklet	G5/SNR
Southwestern Great Basin Silverspot**	<i>Argynnis nokomis nitocris</i>	Catron, Grant	View Booklet	T3/SNR

* BISON-M is the [Biota Information System of New Mexico](#) website provided by the Department in partnership with Natural Heritage New Mexico.

****Recommend updating the common and latin name for this species and possibly removing this species from the Species of Conservation Concern list as the information available to the Department did not support there being any recent detections on Gila National Forest lands.**

Thank you for the opportunity to review and submit comments regarding this project. Please contact Erin Salano, Terrestrial Habitat Specialist, at erin.salano@dgf.nm.gov or (505) 321-5485 with any questions.

Sincerely,

Virginia Seamster, Ph.D.

Assistant Chief for Technical Guidance, Ecological and Environmental Planning Section

cc: USFWS NMES Field Office

Elise Goldstein, Assistant Chief of the Wildlife Section, Wildlife Management Division

Donald Auer, Assistant Chief of the Habitat and Lands Section, Wildlife Management Division