

NM Strategicplan

From: Shelbie Knox [shelbie@nmelc.org]**Sent:** Fri 7/15/2005 2:18 PM**To:** NM Strategicplan**Cc:****Subject:** Form Post From Mozilla**Attachments:**

Contact_Name=Douglas Meiklejohn Street_Address1=New Mexico Environmental Law Center Street_Address2=1405 Luisa Street, Ste. #5 City=Santa Fe State=NM Zip=87505 Phone= Contact_Email=dmeiklejohn@nmelc.org General_Comments=The New Mexico Environmental Law Center (Law Center) thanks the New Mexico Department of Agriculture for the opportunity to comment on the Interim Final Statewide Policy and Strategic Plan for Non-Native Phreatophyte/Watershed Management. Its staff appreciates the Department's work to develop a comprehensive set of priorities to guide salt cedar control efforts including revegetation and rehabilitation, longterm management and maintenance, and monitoring of the progress of these efforts. Recommendations_Comments=While the Law Center applauds the goal of removing non-native phreatophytes, and the specific objectives of the Phreatophyte Plan outlined above, it has some concerns about the Plan. First, the Law Center is concerned about the overuse of aerial spraying of herbicides in and near New Mexico's waterways; we urge the NMDA to consider and implement projects that rely upon mechanical removal of non-native species, as related in the Protocols for Control Template #3. Second, we are concerned that, historically, not enough funds have been spent to restore ecosystems that have been affected by phreatophyte removal, and support the HB-2 Work Group's recommendation that project prioritization include objective criteria for restoration and maintenance, and that objective evaluation criteria be developed to assess performance. Implementation_Comments=The Law Center supports the HB-2 Working Group's recommendations to develop Best Management Practices, and mechanisms such as a handbook and a database by which to make this information and other information available to the public. We also strongly support the implementation recommendation to convene an independent panel which will use sound science, and urge the NMDA to ensure the independence and diversity of the panel so as to ensure that it is supported by all stakeholders. As this panel will include experts who will be able to evaluate the "critical habitat, fire threat, cultural significance, containment strategy, and other factors," as well as the impact of the phreatophyte-removal techniques on the habitat and surrounding communities, we support the HB-2 Working Group's recommendation that the technical advisory panel should play a role in selecting and evaluating projects. At the same time, affected communities should be given ample opportunity to effectively participate in the planning and evaluation processes. Thank you again for this opportunity to comment. Templates_Comments=