



Hand Delivered

July 15, 2005

Phreatophyte/Watershed Management
New Mexico Dept. of Agriculture
MSC 3189 Box 30005
Las Cruces, NM 88003-8005

RE: Comments on NM Statewide Policy and Strategic Plan for
Non-Native Phreatophyte/Watershed Management

To Whom It May Concern:

Thank you for the opportunity to submit comments on New Mexico's Statewide Policy and Strategic Plan (Plan). The Plan is an excellent step in framing the issues and next steps, coalition building, and developing criteria by which to control, rehabilitate, monitor and maintain invasive phreatophytes. Our comments are directed towards clarifying the overarching State objective for invasive phreatophyte management, and refining the management framework, recommendations, templates and protocols.

Guiding Principles:

Presumably, the purpose of the Guiding Principles is to guide implementation of the phreatophyte management plan. The Guiding Principles are broad. It is unclear how the plan will be implemented, or funding priorities established, in the event the broadly stated principles contravene one another. To prevent conflict in the event of uncertainty, the State Plan may wish to prioritize the guiding principles or more clearly state the overarching objective for New Mexico's management of non-native phreatophytes. For example, how does the Plan define the functions of an ecosystem and watershed and by what measurable standards will the plan's implementers conserve and restore those functions to a "healthy" state? What is the definition of "healthy" in the context of the Plan?

Based on our review of the Guiding Principles, it would appear that the FWHP Guiding Principles come closest to clearly defining what the Plan means by the term "healthy" functions. The other Principles address coalition building, process and planning. The FWHP Guiding Principles set forth three standards by which to promote and measure the health of New Mexico's ecosystem and watershed functions: ecological integrity, natural processes, and long-term resiliency. WWF supports clarification of the Plan's Vision and Guiding Principles to state ecological restoration is the overarching objective for New

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Mexico's management of phreatophytes as defined by FWHP consistent with FWHP's socio-cultural and economic framework.

WWF also strongly concurs with the Guiding Principles emphasis on hydrologic processes, collaboration, watershed planning, and measurable objectives. WWF believes the Hydrologic Guiding Principle is key to the success of on-site tamarisk control and revegetation with native species. Restoration of natural hydrologic processes is also one of the most important components to advancing the ecological integrity of New Mexico's watersheds.

Recommendations:

- I. **Management:** Because it appears that a consortium of state agencies and the Soil and Water Conservation Commission share various aspects of program management, WWF recommends that review of the Plan and its "action items" occur more frequently than annually. More frequent meetings, whether they are quarterly or semi-annually, will facilitate communication between consortium members, and implementation of adaptive management as needed.

Representatives of the review team should be clearly delineated in the Plan since it is unclear to WWF who comprises the "project proponents, relevant technical advisors, and partners." Further, representation on the review team should be balanced among different stakeholders and interests (recreation, agriculture, environmental, etc.), state agencies and independent experts in non-native phreatophyte management and related issues, i.e., ecology, hydrology, planning. It is unclear whether "project proponents" are recipients of project funds. Recipients of project funds will have important insights and opinions about program implementation that should inform program review, but because of the potential financial conflict-of-interest, their role in the review should be limited appropriately.

A frequent, balanced, expert and independent review of the program is critical to accomplishing the Plan's vision of becoming a "national model."

An independent assessment of projects to determine whether measurable objectives have been achieved should be performed by an independent entity with expertise in evaluating the projects measurable objectives.

- II. **Planning:** WWF supports the Plan's adoption of FWHP rehabilitation perspective for watersheds. WWF suggests that legislative funding for watershed-scale plans on the five principal watersheds be included in the recommendations of "critical importance" appearing at page 6-7 of the Plan so that State landscape-scale priorities will inform funding priorities.
- III. **Funding:** WWF supports prioritizing project funding such that rehabilitation of existing sites takes precedence over new projects. Rehabilitation is time

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sensitive. Failure to rehabilitate at the appropriate time may likely result in a reinfestation of tamarisk and a waste of the initial expenditure of federal and state dollars to control it. Secondary priorities should be control projects in watersheds where state watershed-scale plans have been developed and local planning documentation is sufficient. Tertiary priorities should be control projects where local planning documentation is sufficient.

- IV. Monitoring: WWF agrees that monitoring is critical to long-term success of non-native phreatophyte control and is consistent with the Plan's stated goal of becoming the "national model."
- V. Government Actions: WWF strongly supports coordination and watershed planning across political jurisdictions in the five principal basins.

2005 Actions for NMDA:

3. WWF suggests that NMED, NMDA and the Soil and Water Conservation Commission should develop the prioritization framework for new 2006 projects in consultation with the Technical Advisory Panel. Broader participation in the development of funding priorities is consistent with the Plan's goal of becoming the "national model." Priorities for new projects should be based on compliance with the Guiding Principles and overarching objective for New Mexico's phreatophyte management plan first and foremost, and then assuming these principles are met and the objective is served, other factors such as critical habitat, fire threat, cultural significance, containment strategy, etc.

5. See comments under Management section above relating to representation on a review team.

Templates and Protocols: WWF has previously commented on the Templates and Protocols for Restoration and Rehabilitation and acknowledges the HB2 Workgroup's incorporation of WWF's suggestions. WWF would further request that the Hydrologic Guiding Principle and the Ecological FWHP Guiding Principles be incorporated into the templates and protocols governing revegetation and rehabilitation including those governing the "objective for each site."

Errata:

Plan, p.15, 4th paragraph, last line: delete "national", insert "natural"
Public Participation Plan, p. 8, delete "World Wildlife Foundation", insert "World Wildlife Fund"

Yours truly,



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