

In my opinion, the major thrust of this policy-plan should be to help decide how, when, why, where and if salt cedar management should be implemented. I'm not sure we are there yet. Here are some observations and comments.

The Statewide Policy and Strategic Plan should address PL 88-594, 78 Stat. 942 which was a product of the Pecos River Compact. As a result of PL 88-594, the Bureau of Reclamation cleared approximately 35,000 acres of salt cedar from the Pecos River flood plain in New Mexico and about 18,000 acres in Texas. This work was done in the late 60's and early 70's. These cleared areas have been maintained free of salt cedar re-infestation. This project controlled all the large stands of salt cedar growing on the flood plain of the Pecos in New Mexico, with the exception of the McMillan delta. This is by far the largest salt cedar control project ever done in the United States and it is not mentioned in this plan. Pecos River Native Riparian Restoration Organization also has treated 4,000 acres in the upper reaches of the McMillan delta in 1995. The only salt cedar that were left after these two projects were in a narrow strip approximately 20 to 30 feet wide growing on the Pecos river banks and the major tributaries. Most of these areas have now been aerially sprayed with Arsenal during the past three years through a project funded by the New Mexico State Legislature. The acres of salt cedar on the Pecos have been reduced by 90+% since 1965. The acreage estimate in this policy-plan of Salt Cedar on the Pecos River are much too high.

Please review USGS Water Resource Investigation Report 87-4148 and 88-4054 and USGS Professional Paper 491-G. A thorough review of these studies is critical in finalizing your Strategic Plan. In my opinion, these studies should be included in the supporting documents for this plan. Also, someone should interview G. E. Welder in person.

There are some virtues of salt cedar growing on the river banks in the lower Pecos. Cottonwood and willows never grew on the lower Pecos. When salt cedar began growing on the Pecos it became a vegetation niche that provided shade, cover, nesting habitat and stream bank stabilization that never before existed. How will the

loss of these benefits be mitigated? The plan should address this. Re-establishment of perennial vegetation to replace salt cedar on the river bank will be difficult, if not impossible, on the lower Pecos. How will the river bank be stabilized until re-vegetation is successful? What is a reasonable per acre cost to replacing salt cedar with other vegetation? Will the E.T. for replacement vegetation or bare ground cost as much water as the salt cedar? Salt cedar will immediately re-establish along the river banks on the lower Pecos after control efforts. Will there be expensive follow-up control efforts? Should these problems be mentioned in the plan or would they be better addressed in the watershed-scale plans?

In my opinion, the templates and protocols section in the policy-plan is well done.

Thanks for the opportunity to provide comments.

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