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28 August 2026

Wendy Blackwell, Senior Environmental Planner
Tetra Tech
2100 Osuna Road NE, Suite 100
Albuquerque, NM 87113

RE: NMDOT District 1 Integrated Vegetation Management Plan; NMERT Project No. NMERT-6445

Dear Ms. Blackwell,

The New Mexico Department of Transportation (NMDOT) has prepared a draft Integrated Vegetation Management (IVM) plan to be implemented for District 1 (Proposed Action). The New Mexico Department of Wildlife (Department) would like to thank Tetra Tech and NMDOT for the opportunity to comment on the Proposed Action. In addition to the information provided in the attached New Mexico Environmental Review Tool (NMERT)-generated report for this project (NMDOW 2026), the Department has the following comments on the Proposed Action and associated documents.

Comments on the District 1 IVM Plan

In addition to those included in the attached NMERT report, the Department has the following new or reiterated recommendations regarding herbicide application:

- Avoid herbicide spraying when dew is present.
- Avoid applying herbicides to and removing vegetation that is being used by pollinating insects for foraging (i.e., flowering plants). It is especially important to avoid areas with abundant and diverse native floral species. If herbicides must be applied to flowering plants, apply them early in the season, before plants flower. When foraging pollinating insects may be present in the project area, herbicides should be applied outside of the timeframe when most pollinating insects are potentially active above ground and foraging (March - October). Avoid herbicide application in early spring as floral resources are typically limited yet important in this period when bumble bee (*Bombus* spp.) queens are starting new colonies. If herbicides must be applied May-October, try to apply herbicides in the early

morning or in the evening when pollinators are generally less active. Once plants flower, consider mowing prior to herbicide application as appropriate to deter local use by pollinating insects. When feasible, replace any removed pollinator-friendly vegetation with native flowering plants with similar flower characteristics and phenology.

- The Department recommends avoiding herbicides noted as being toxic to bees according to the [Bee Precaution Pesticide Ratings tool](#), herbicides with long residual toxicities, or herbicides sold as dust or wettable powders; granular herbicides are less likely to be hazardous to bees and more selective herbicides designed for the target plant species are preferred.
- Use the lowest concentration and least number of applications possible that will still allow for the achievement of the desired result and ensure application is conducted by qualified, trained applicators.

As included in the herbicide guidelines in the attached auto-generated project report, the Department recommends glyphosate and triclopyr be avoided due to the potential for these chemicals to negatively impact wildlife. Caution may also be needed when using aminopyralid, especially near potential water sources, due to its high water solubility. The [Bee Precaution Pesticide Ratings tool](#) should be used to select the least-toxic, most specialized herbicide to minimize impacts on native insect pollinators.

The Department appreciates the inclusion of the 15-foot buffer area relevant to roadside management to protect pollinators, deer, elk (*Cervus canadensis*), and other species that may otherwise attempt to forage along the roadway.

Additionally, the Department would like to note that the following state-endangered plants: Arizona crested coralroot (*Hexalectris arizonica*), Chihuahua scurfpea (*Pediomelum pentaphyllum*), Coleman's coral-root (*Hexalectris colemanii*), Duncan's corycactus (*Escobaria duncanii*), Goodding's onion (*Allium gooddingii*), Kuenzler's cactus (*Echinocereus fendleri* var. *kuenzleri*), Mescalero milkwort (*Rhinotropis rimulicola* var. *mescalorum*), Metcalfe's penstemon (*Penstemon metcalfei*), Mimbres figwort (*Scrophularia macrantha*), night-blooming cereus (*Peniocereus greggii* var. *greggii*), Organ Mountain pincushion cactus (*Escobaria organensis*), Parish's alkali grass (*Puccinellia parishii*), puzzle sunflower (*Helianthus paradoxus*), sand prickly-pear (*Opuntia arenaria*), Sneed's pincushion cactus (*Escobaria sneedii* var. *sneedii*), swale paintbrush (*Castilleja ornata*), Todsens pennyroyal (*Hedeoma todsenii*), tomentose paintbrush (*Castilleja tomentosa*), Villard's pincushion cactus (*Escobaria villardii*), Wright's marsh thistle (*Cirsium wrightii*), yellow lady's-slipper (*Cypripedium parviflorum* var. *pubescens*), and Zuni fleabane (*Erigeron rhizomatus*), may occur near or within the Proposed Action footprint. The NMDOT may need to consider mitigating the Proposed Action's impact on these species while designing and implementing project activities. The Department recommends that Tetra Tech contact Erika Rowe, (Erika.Rowe@emnrd.nm.gov) at the [New Mexico Endangered Plant Program](#) of the Energy, Minerals, and Natural Resources Department, regarding potential presence of, and conservation needs for, state-listed plants.

Comments on Appendix J: Recommended Plant Species

The Department appreciates the consideration of pollinator life stages, flowering times, and pollinator value in the creation of the recommended species list for the Proposed Action. The Department recommends the use of the pollinator-friendly plant species lists provided by the [Xerces Society for Invertebrate Conservation](#) to determine if any additional species may be beneficial across the ecoregions within District 1.

Comments on the Mowing Manual Handout

The Department appreciates the consideration of pollinators and other species with regards to the timing of mowing. In addition to the guidelines outlined in the mowing manual handout, the Department recommends avoiding mowing when native species are in bloom, rather than only avoiding mowing during the early spring. The Department also recommends mowing in the middle of the day at a lower speed to reduce individual mortality and using a flushing bar during all seasons to protect the species that may remain active even in winter months.

Regarding chemical mowing, the Department suggests that chemical mowing be avoided unless absolutely necessary. If other methods cannot be utilized, the Department suggests utilizing the [Bee Precaution Pesticide Ratings tool](#) and selecting the least-toxic, most specialized option to minimize impacts on native insect pollinators. The Department also recommends adhering to the herbicide application guidance provided in the NMERT report and the IVM Plan document comment section above.

Comments on the Tree Management and Weed Control Manual Handouts

As stated above, the Department recommends glyphosate and triclopyr be avoided due to the potential for these chemicals to negatively impact wildlife. The Department also recommends caution when using aminopyralid, especially near potential water sources, due to its high water solubility.

If any large trees, especially saltcedar (*Tamarix* spp.) and Russian olive (*Elaeagnus angustifolia*), are removed, surveys for yellow-billed cuckoo (*Coccyzus americanus*) and/or southwestern willow flycatcher (*Empidonax traillii extimus*) may be necessary in certain areas. The Department recommends consultation with relevant species leads at the United States Fish and Wildlife Service's (USFWS's) New Mexico Ecological Services Office (NMESO) before work begins in areas these species may occur to determine potential additional needs.

Thank you for the opportunity to review and comment on the Proposed Action and for your consideration of these comments. If you have any questions regarding terrestrial habitat or species, please contact Meredith Dalton, Terrestrial Habitat Specialist, at (505)709-0671 or meredith.dalton@dgf.nm.gov.

Sincerely,

Virginia Seamster
Assistant Chief for Technical Guidance
Ecological and Environmental Planning Section, Wildlife Management Division

References

[NMDOW] New Mexico Department of Wildlife. 2026. District 1 Integrated Vegetation Management (IVM) Plan. New Mexico Environmental Review Tool Report. New Mexico Department of Wildlife, Santa Fe, New Mexico, USA.
<https://nmert.org/system/files/project_report_district_1_integrated_veget_44859_45604.pdf>.