

U.S. Department of Interior  
U.S. Fish and Wildlife Service  
1849 C Street, NW  
Washington, DC 20240

Re: FWS-R2\_ES-2016-0119 (Wild Gypsum Buckwheat)  
FWS-R2-ES-2016-0137 (Kuenzler Cactus)

The Native Plant Society of New Mexico (NPSNM) respectfully submits the following comments in regards to the Department of Interior U.S. Fish & Wildlife Service proposals to remove protections under the Endangered Species Act for two rare New Mexico plants:

1. Delisting of the Wild Gypsum Buckwheat (*Eriogonum gypsophilum*) and
2. Downlisting of the Kuenzler Cactus (*Echinocereus fendleri* var. *kuenzleri*)

NPSNM is a non-profit organization with more than 700 members in seven chapters around the state and in El Paso, Texas. Our mission is to educate the public about native plants by promoting knowledge of plant identification, ecology, and uses; foster plant conservation and the preservation of natural habitats; support botanical research; and encourage the appropriate use of native plants to conserve water, land, and wildlife.

Drastic action such as the proposed removal and down listing should be undertaken cautiously and only on the basis of adequate scientific data on which valid projections of the species' continued existence and safety from extinction can be made.

The recovery plans for both species are more than 30 years old. Both need to be updated on the basis of scientific surveys and monitoring to determine population trends, that is, whether known populations are increasing, stable or, as is more likely, in decline. The prolonged, long-term droughts of the southwest, are projected to increase with climate change. The viability of this rare and unique plants should be assessed with that probability in mind.

### **Wild Gypsum Buckwheat:**

Livestock grazing poses a threat to a significant portion of this plant's habitat, with the result that a higher percentage of juvenile forms occur with a likely lower reproduction rate. Its low reproduction rate requires extensive study of the quality of its seed reproduction and pollination.

The two additional populations discovered in 1985 have not had current population monitoring conducted and may simply be the result of a greater search effort. Their existence without further study does not represent a population increase.

The heavy traffic associated with oil & gas development surrounding the plant's occupied habitat cause habitat fragmentation and dust deposition, both of which should be studied to determine the effect on pollination success.

**Kuenzler Cactus:**

No data exists on the effects of livestock grazing, invasive species and fire. Additional threats that should be evaluated are inept and rodent predation and pollinator limitations.

In closing, NPSNM thanks you for the opportunity to comment on the proposed changes in the status of these two rare and unique New Mexican plants. There is an abysmal lack of scientific data available to justify such changes. Before any change is contemplated, extensive further studies. The mere fact that some of these two plantar known to still exist does not mean that their populations are viable. Extinction is forever.

Sincerely yours,

Tom Stewart, President  
Native Plant Society of New Mexico