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Submitted by email to julie_crawford@fws.gov (mailto:julie_crawford@fws.gov).

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RE: U.S. Fish and Wildlife Service. 2016. Draft recovery plan for *Coryphantha scheeri* var. *robustispina* (Pima pineapple cactus). U.S. Fish and Wildlife Service, Southwest Region, Tucson, Arizona. 75 pp.; 82 FR 28875, Docket Numbers FWS-R2-ES-2016-N203, FXES11130200000-167-FF02ENEH00

Ms. Crawford:

The Pima Natural Resource Conservation District (District) herein provides comment on the proposed recovery plan for the Pima Pineapple Cactus.

About the District

The District was created in 1943 and continues to be governed under Chapter 6 of Title 37 of the Arizona Revised Statutes. The District is structured as a hybrid of a state agency funded under the State Lands Natural Resources Division and as an independent local unit of Arizona government with a Board of Supervisors consisting of both elected and Governor-appointed Supervisors. The expertise of the Pima NRCD is recognized by Arizona statute 37-1054 (A) as follows:

“This state recognizes the special expertise of the districts in the fields of land, soil, water and natural resources management within the boundaries of the district.”

The District works together with and represents “cooperators” who are persons having natural resources under their control and who have each voluntarily signed an agreement to pursue soil and water conservation efforts in cooperation with the District.

The District’s geographical boundaries roughly encompass all areas of Pima County excluding the Yaqui and Tohono O’Odham Nations’ reservation lands. The District covers 2.14 million acres of

land in Pima County and a small area of southern Pinal County encompassing the Los Robles Archaeological District.

About the Recovery Plan

These are the impressions which we have taken from this Draft Recovery Plan.

Your plan argues that in order to recover the species we still need:

- (1) more information from field studies to determine how prescribed burns affect PPC,
- (2) more information from field studies to determine how managed livestock grazing affects PPC, and
- (3) more land acquisitions made specifically to recover this species.

With regards to fire and cattle grazing, the Buenos Aires National Wildlife Refuge (BANWR) has not been grazed for 32 consecutive years and each fire management unit has been burned at least once since 1985. Some units have been burnt several times during the Refuge's history. Cattle have been absent on the Refuge for 32 consecutive years. Your agency's Handbook for Section 7 Consultation is unambiguous; each consultation should require comparable requirements from each party for a given species. The Fish and Wildlife staff of BANWR must survey with the same intensity and prepare pre-burn and post-burn reports just as any land manager must do for prescribed burns. What is still needed in this PPC recovery plan are:

- (1) A very transparent and detail-rich accounting of BANWR for each fire management unit of the earliest surveys and numbers of PPC compared to your most recent surveys and numbers of PPC on these same fire management units. We need to see a clear accounting of the surveys on BANWR, the number of PPC in each unit in the 1990s after listing and the numbers for these same units today.

You also have the records of the population level and individual plant levels to determine what the combined effects of grazing and fire have been from a number of ranches which have completed prescribed burns with surveys taken as per your instruction before, within a month after the fire and a year after burning. But we would expect to see the comparison in a recovery plan presented this many years after having PPC declared endangered. This has been a very long-running "experiment" and the outcomes matter in the recovery of this species.

- (2) An accounting of the numbers of PPC on grazed or grazed/burned lands immediately outside BANWR's property fence line. Side by side comparisons afforded by the fence line provide deep insight into what are now already long-term outcomes from differing managements on PPC populations. These comparisons case by case need to be explicitly included in the recovery plan as well. The documents exist for making these comparisons.

We do not see a pressing need for 'more information' but rather well-vetted, detailed accounts of the outcomes for PPC populations (total estimated numbers and population size structures) on Federal lands. BANWR is ungrazed by cattle. The other Federal land we are aware of that has PPC is Coronado National Forest. Grazing utilization has been dropped to less than 40% on the Forest allotments in support of the needs of PPC. We are interested to learn in the recovery plan what the outcome for PPC on Coronado National Forest has been since grazing utilization was substantially

lowered in the mid-1990s. These direct comparisons if made clear in the text of your recovery draft would make a huge step towards understanding how critical 'more information' regarding range management approaches is at this time. Again, we request that you make these careful, unbiased comparisons and develop these in your draft.

With regards to land acquisitions to be made specifically for the recovery of this species, we would note that less than 15% of the core area of PPC has been developed (roads, subdivisions) or directly impacted by mining – the two landscape alterations that result in a direct loss of occupied land by PPC. Mining is simply not a potential threat across a majority of this plant's range in Arizona. PPC is widely distributed on the other 85% of its core range. Land acquisitions are expensive and incrementally will not significantly expand the total number of acres never to be developed.

At this stage, it may not be necessary for FWS to acquire and perpetually manage additional lands to protect PPC. The BANWR covers over 120,000 acres, much of which is PPC habitat. Other existing protected areas include National Forest lands, the Palo Alto PPC Bank (Attachment B), the Pima County PPC Bank and additional lands that have already been set aside to mitigate the impacts of urban development on the PPC.

After reading the entire document a number of times, we have concluded that the recovery plan for Pima pineapple cactus does not in fact lay out a clear plan for recovery of this species. We find that the PPC draft recovery plan is weak in content, this in spite of 25 years of data collection.

We have always been willing to participate in studies and surveys. We are aware of just how much work has been done in the field with PPC. As such, we expected to see a well-vetted draft recovery plan. To wit, if your agency does not use the information gathered in a meaningful way, then the long-term benefit of these not-modest efforts is called into question.

Sincerely,

Patricia King

Supervisor, Pima NRCD