

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)

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 a rare New Mexico plant: delisting of the Wild Gypsum Buckwheat (*Eriogonum gypsophilum*).

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 delisting 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 plan is more than 30 years old. It needs to be updated on the basis of scientific surveys and monitoring to determine population trends, that is, whether known populations are increasing, stable or in decline. The prolonged, long-term droughts of the Southwest may have set recovery back, and they are projected to increase with climate change. The viability of this rare and unique plant should be assessed with that probability in mind.

Livestock grazing poses a threat to a significant portion of this plant's limited 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 discovery of two additional populations in 1985 may simply be the result of a greater search effort, and they have not had current population monitoring conducted. Their presumed existence without further study does not represent a population increase. The heavy traffic associated with oil & gas development surrounding the plant's occupied habitat pose a threat of habitat fragmentation and dust deposition, both of which should be studied to determine the effect on pollination success.

NPSNM thanks you for the opportunity to comment on the proposed changes in the status of this unique New Mexican plants. There is a lack of scientific data available to justify such a change. Before any change is contemplated, extensive further studies must be carried out. The mere fact that some individuals continue to exist does not mean that their populations are viable. Extinction is forever.

Sincerely yours,
Tom Stewart, President
Native Plant Society of New Mexico