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3 October 2025

Madonna L. Baucum
Service Information Collection Clearance Officer
U.S. Fish and Wildlife Service
5275 Leesburg Pike
MS: PRB (JAO/3W)
Falls Church, VA 22041-3803

RE: Agency Information Collection Activities; Policy for Evaluation of Conservation Efforts when Making Listing Decisions (PECE); FWS-HQ-ES-2025-0008; OMB Control No. 1018-0119; NMERT Project No. NMERT-4995

Madonna Baucum, Service Information Collection Clearance Officer

The New Mexico Department of Game and Fish (Department) has the following comments regarding the U.S. Fish and Wildlife Service's (USFWS's) Notice of information collection, request for comment regarding Agency Information Collection Activities; Policy for Evaluation of Conservation Efforts When Making Listing Decisions (PECE) (RFC). Overall, the Department is supportive of the continuation of information collection activities under the PECE and does not consider previous such requests from the USFWS to be burdensome. The Department also appreciates the related opportunity to contribute to the federal species listing determination process. The Department has the following more specific comments regarding the RFC:

- 1) **Previous requests for information:** The Department has responded to previous requests for information from USFWS during the listing decision process for a variety of species, including multiple amphibians (Arizona toad [*Anaxyrus microscaphus microscaphus*], boreal toad [*Anaxyrus boreas boreas*]), birds (eastern black rail [*Laterallus jamaicensis jamaicensis*], interior least tern [*Sternula antillarum athalassos*]), reptiles (dunes sagebrush lizard [*Sceloporus arenicolus*], western river cooter [*Pseudemys gorzugi*], western massasauga [*Sistrurus tergeminus*]), and fishes (Rio Grande chub [*Gila pandora*], Rio Grande sucker [*Catostomus plebeius*], Rio Grande cutthroat trout [*Onchoryncus clarkii virginalis*]). Responses were prepared with minimal requirements for personnel time (e.g., 1-4 hours per request). The Department has also participated in

providing data to inform Species Status Assessments (SSAs) for a variety of species (e.g., Bendire's thrasher [*Toxostoma bendirei*], Chihuahua chub [*Gila nigrescens*], Jemez Mountains salamander [*Plethodon neomexicanus*], narrow-headed gartersnake [*Thamnophis rufipunctatus*], northern Mexican gartersnake [*T. eques megalops*], Pecos pupfish [*Cyprinodon pecosensis*], and pinyon jay [*Gymnorhinus cyanocephalus*]). The Department has also participated in the development of conservation and management plans for species including the Jemez Mountains salamander (which was finalized during and directly pertinent to the listing process), boreal toad, dunes sagebrush lizard, Rio Grande chub, Rio Grande sucker, and Rio Grande cutthroat trout. While the development of these plans takes substantive time, the Department does not engage in planning activities unless it is determined necessary based on the needs of the species and the Department's conservation priorities. These activities are not predicated on the listing status of the focal species. Therefore, providing these plans in response to information collection activities by USFWS is not burdensome and the Department feels that consideration of these plans by USFWS during the listing decision process is valuable and reflective of a good collaboration with state agencies and consideration of their perspectives and conservation work. For example, the Department plans to participate in the anticipated data request for the pinyon jay SSA and is actively participating in the Rangewide Conservation Action Strategy for this species.

Thank you for the opportunity to review and comment on USFWS's RFC and your consideration of these comments. The Department looks forward to future requests for information regarding federal species listings.

Sincerely,

Michael B. Sloane
Director