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31 July 2026

Service Information Collection Clearance Officer
Attn: Docket No. FWS-HQ-ES-2026-1124
U.S. Fish and Wildlife Service
MS: PRB (JAO/3W)
5275 Leesburg Pike
Falls Church, VA 22041-3803

RE: Agency Information Collection Activities; Federal Fish and Wildlife Permit Applications and Reports – Native Endangered and Threatened Species Comments – FWS-HQ-ES-2026-1124; NMDOW No. NMERT-6091.

Dear Ms. Baucum,

The U.S. Fish and Wildlife Service (USFWS) issued a request for comment ([USFWS 2026](#)) regarding Agency Information Collection Activities; Federal Fish and Wildlife Permit Applications and Reports- Native Endangered and Threatened Species (RFC). Overall, the New Mexico Department of Wildlife (Department) is supportive of the continuation of information collection activities pertinent to Species Status Assessments (SSAs) and species recovery plans and does not consider previous such requests from the USFWS to be burdensome. The Department also greatly appreciates the opportunity to contribute to the federal species listing determination and species recovery processes, especially as much on-the-ground implementation of recovery plans falls on Department staff. The Department has the following more specific comments regarding the RFC:

- 1) **Previous requests for information:** The Department has responded to many previous requests for information from USFWS regarding SSAs and species recovery plans, including, just in the last few years, SSAs for:
 - American bumble bee (*Bombus pensylvanicus*)
 - Arizona toad (*Anaxyrus microscaphus microscaphus*)
 - Arkansas River shiner (*Notropis girardi*) ***ongoing**
 - Bolson tortoise (*Gopherus flavomarginatus*)
 - Boreal toad (*Anaxyrus boreas boreas*)
 - Chihuahua chub (*Gila nigrescens*)

- Chupadera springsnail (*Pyrgulopsis chupaderae*)
- Colorado pikeminnow (*Ptychocheilus lucius*)
- Dunes sagebrush lizard (*Sceloporus arenicolus*)
- Gila topminnow (*Sceloporus arenicolus*) ***ongoing**
- Jemez Mountains salamander (*Plethodon neomexicanus*)
- Mineral Creek mountainsnail (*Oreohelix pilsbryi*)
- Monarch butterfly (*Danaus plexippus*)
- Narrow-headed gartersnake (*Thamnophis rufipunctatus*) ***on hold**
- Northern Mexican gartersnake (*Thamnophis eques megalops*) ***ongoing**
- Pecos pupfish (*Cyprinodon pecosensis*)
- Pecos springsnail (*Pyrgulopsis pecosensis*)
- Peppered chub (*Macrhybopsis tetranema*)
- Pinyon jay (*Gymnorhinus cyanocephalus*) ***ongoing**
- Rio Grande chub (*Gila pandora*)
- Rio Grande cooter (*Pseudemys gorzugi*)
- Rio Grande cutthroat trout (*Oncorhynchus clarkii virginalis*)
- Rio Grande shiner (*Notropis jemezianus*)
- Rio Grande sucker (*Catostomus plebeius*)
- Variable cuckoo bumble bee (*Bombus variabilis*)
- Western massasauga (*Sistrurus tergeminus*)
- White Sands pupfish (*Cyprinodon tularosa*)
- Yellow-billed cuckoo (*Coccyzus americanus*)
- Zuni bluehead sucker (*Pantosteus discobolus jarrovi*) ***ongoing**

As well as recovery plans for:

- Arkansas River shiner (*Notropis girardi*)
- Chupadera springsnail (*Pyrgulopsis chupaderae*)
- Colorado pikeminnow (*Ptychocheilus lucius*)
- Gila trout (*Oncorhynchus gilae*)
- Jemez Mountains salamander (*Plethodon neomexicanus*) ***beginning**
- Loach minnow (*Rhinichthys cobitis*) ***ongoing**
- Mexican long-nosed bat (*Leptonycteris nivalis*)
- New Mexico ridge-nosed rattlesnake (*Crotalus willardi obscurus*) ***beginning**
- Peppered chub (*Macrhybopsis tetranema*)
- Sacramento Mountains checkerspot butterfly (*Euphydryas anicia cloudcrofti*)
- Spikedace (*Meda fulgida*) ***ongoing**
- Texas hornshell (*Popenaias popeii*)
- Zuni bluehead sucker (*Pantosteus discobolus jarrovi*)

The Department plans to continue participation in SSA and recovery planning processes, including participating in the anticipated SSAs for the black-footed ferret (*Mustela nigripes*) and recovery plan for the Peñasco least chipmunk (*Neotamias minimus atristriatus*).

Past responses were prepared with moderate requirements for personnel time, and response times ranged from roughly 5-40 hours for SSAs and recovery plans, with an average response time of approximately 15 hours. Document reviews alone can require minimal staff input, roughly 4-8 hours, while more

engagement from Department staff in an SSA technical committee or recovery team can require much more substantive time, closer to the 30-hour plus mark. Thus, the upper limit of the range for estimated completion time per response should be increased to a minimum of 15 hours. Much of the increased time commitment for engagement in the SSA development and recovery planning processes is voluntary, as Department biologists provide valuable data and support analyses used in SSAs and recovery plans. Department biologists commonly spend extra time reviewing documents that pertain to species managed under their respective positions to help ensure those documents provide the most benefits to species here in New Mexico and that they can assist in effective implementation, especially of final recovery plans. As mentioned above, there are often times that Department biologists receive requests for review from USFWS with a short turnaround and have little time to review, especially when juggling busy field schedules. This means the average response time given above may be inaccurate, and the USFWS should consider use of an increased estimate (e.g., 20 hours or more) as Department staff would likely spend more time on reviews if given sufficient lead notice to do so.

- 2) **Section 10 Recovery Permit applications and reporting:** The Department would appreciate the ability to review and provide comments regarding the updated forms for Section 10 Recovery Permits prior to their finalization.
- 3) **Minimizing the burden of information collection activities:** The ability to submit information via electronic means, either online via the eRulemaking Portal or via email, is important in terms of minimizing the burden on state agencies, including the Department.

As mentioned above, ensuring requests for information and participation are transmitted with adequate time for Department biologists to review and provide the USFWS with thorough responses is crucial to addressing capacity limitations, especially during key field seasons. Specifically, the Department would appreciate consistently being given sufficient time (at least 45 days) for reviews and for the USFWS to consider timing of requests for input relative to key field seasons (i.e., being given more time, at least 60 days, during months when the Department's relevant species expert/experts is/are consistently in the field).

Thank you for the opportunity to review and comment on the RFC and for the USFWS's consideration of these comments. If you have any questions, please contact Meredith Dalton, Terrestrial Habitat Specialist, at (505) 709-0671 or meredith.dalton@dgf.nm.gov.

Sincerely,

Michael B. Sloane
Director

References

[USFWS] U.S. Fish and Wildlife Service. 2026. Agency Information Collection Activities; Federal Fish and Wildlife Permit Applications and Reports – Native Endangered and Threatened Species. Federal Register 91(105):32995-32998.
<<https://www.federalregister.gov/documents/2026/06/02/2026-11008/agency-information-collection-activities-federal-fish-and-wildlife-permit-applications-and>>.