



New Mexico Cattle Growers' Association

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March 2, 2022

U.S. Fish and Wildlife Service
Arizona Ecological Services Office
Attn: Mark Lamb, Acting Field Supervisor
31st Avenue
Phoenix, AZ 85051-2518

Re: Endangered and Threatened Wildlife and Plants; Initiation of 5-Year Status Reviews of 35 Species in the Southwest

Dear Mr. Lamb:

The New Mexico Cattle Growers' Association (NMCGA) with members in 32 of New Mexico's 33 counties as well as some other 19 states offers the following comments on the five-year review of 35 species.

We object generally to how the Fish and Wildlife Service (FWS) is seeking comments. Commenting on 35 species is a daunting task for anyone. Our members are businessmen and women who go to work each day to produce quality beef for consumers in the United States and internationally. They simply do not have the time to sit at a desk and write comments; to then not have their comments be thoroughly reviewed but rather used as a statistic, or a check in a box. The FWS approach to requesting comments in this quantity and in this manner sends a clear message that FWS isn't particularly interested in receiving quality comments from affected individuals

NMCGA objects to FWS recovery plans for multiple species when the Service refuses to not addressing actual root issues. For example, crayfish kill the loach minnow. Crayfish and chitrid fungus kill Chiricahua leopard frogs. FWS isn't dealing with those root causes. Likewise, the USFS is prohibited from cutting trees in a controlled manner but it seems okay to burn up Mexican spotted owl habitat. FWS proposes to list the Sacramento Mountains Checker Spot Butterfly but has and will do nothing about the elk and feral horses that are responsible for the loss of habitat. Cattle are not the demise of every species on the FWS list of threatened and endangered species. Recovery plans that assume cattle are the achilles heel of every species are offensive, lacking any measure of professionalism.

If FWS is interested in meaningful dialogue on any species, we welcome the opportunity to do so.

Sincerely,

Loren Paterson, President
New Mexico Cattle Growers' Association

LOREN PATTERSON, President, Corona; **BRONSON CORN**, President-Elect, Roswell **JOE CULBERTSON**, Vice-President At Large Amistad, **ROY FARR**, SW Vice-President Datil; **DAVE KENNEKE**, NW Vice-President, Cimarron; **JEFF DECKER**, SE Vice-President, Lovington; **CLIFF COPELAND**, NE Vice-President, Nara Visa; **SHACEY SULLIVAN**, Secretary-Treasurer, Bosque Farms; **RANDELL MAJOR**, Past President, Magdalena **TOM SIDWELL**, Past President, Quay