



July 26, 2016

*Submitted via e-mail to larry\_crist@fws.gov*

Larry Crist  
Ecological Services  
Utah Field Office  
2369 W. Orton Circle, #50  
West Valley City, UT 84119

**RE: 5-Year Status Reviews for the Sclerocactus Brevispinus and the Sclerocactus Wetlandicus**

Dear Mr. Crist:

The U.S. Fish and Wildlife Service (FWS) is currently conducting five-year status reviews of the Sclerocactus Brevispinus and the Sclerocactus Wetlandicus, known by the common names of the Pariette Cactus and the Uintah Basin Hookless Cactus. These two species are currently listed under the Endangered Species Act, but the best available science suggests both species have met the standards for recovery and should be delisted.

Western Energy Alliance represents over 300 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas in Utah and across the West. The Alliance represents independents, the majority of which are small businesses with an average of fifteen employees.

The Pariette Cactus and the Uintah Basin Hookless Cactus are subspecies of the Hookless Cactus. The Hookless Cactus was listed as threatened in 1979, and was subsequently divided into three subspecies, the Colorado Hookless Cactus being the third. The 1979 listing lacked sufficient data and information to understand the historic range, current distribution, and potential threats to the species and its habitat. In 1990 FWS issued a recovery plan for the Hookless Cactus with the goal of a documented population of more than 30,000 individuals.

Over the past 30 years hundreds of surveys have been conducted to document the range and abundant populations of the Hookless Cactus. After decades of these surveys, the best available science shows that the population of the three subspecies of the Hookless Cactus has dramatically increased and now exists in dozens—if not hundreds—of separate populations in Utah and Colorado.

The State of Utah recently completed a comprehensive compilation of Hookless Cactus survey data that finds each subspecies' population is far in excess of the 1990 goal. Data from the survey compilation are available through Utah's Public Lands Policy Coordinating

Office (PLPCO), and we encourage FWS to request this data from PLPCO before it concludes its five-year status review. We are confident these data show that the three Hookless Cactus subspecies are not in danger of extinction and should therefore be delisted.

When FWS divided the Hookless Cactus into three subspecies, it identified oil and natural gas development as a threat to each subspecies. Since then, the oil and natural gas industry has undertaken significant protective measures to ensure the Hookless Cactus population is not threatened by development within the species' habitat. The protections include buffers around Hookless Cactus populations, timing restrictions during the peak flowering period, and prevention of the spread of noxious weeds. These measures have significantly reduced impacts on Hookless Cactus habitat and resulted in growth of new individuals. These protective measures and their identified results demonstrate that oil and natural gas development can coexist with native species.

We urge FWS to consider the population growth of the species and the protections provided by oil and natural gas companies in its five-year review of these two species. Thank you for the opportunity to comment. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Kathleen M. Sgamma  
Vice President of Government and Public Affairs