



# United States Department of the Interior



**Fish and Wildlife Service**  
**Arizona Ecological Services Office**  
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In Reply Refer To:  
AESO/SE  
22410-2005-F-0002-R1

May 1, 2014

Ms. Keisha L. Tatem  
State Conservationist  
USDA, Natural Resources Conservation Services  
U.S. Courthouse – Federal Building  
230 North First Avenue, Suite 509  
Phoenix, Arizona 85003-1733

RE: Reinitiation of Formal Consultation on the Altar Valley Fire Management Plan  
(Consultation #22410-2005-F-0002), Altar Valley, Pima County, Arizona, with regard to the  
proposed Las Delicias Burn.

Dear Ms. Tatem:

Thank you for your request for reinitiation of formal consultation on the Altar Valley Fire Management Plan (AVFMP) covering non-Federal portions of the Altar Valley, Pima County, Arizona. Your request was received by us on April 16, 2014, and was made pursuant to section 7 of the Endangered Species Act of 1973 (16 U.S.C. 1531-1544), as amended (Act). At issue are the possible effects of a proposed revision of the conservation measures related to the Pima pineapple cactus included as part of the original proposed action of the AVFMP, and related specifically to the Las Delicias Burn proposed for June, 2014.

The Natural Resources Conservation Service (NRCS) has determined that only the endangered Pima pineapple cactus (*Coryphantha scheeri* var. *robustispina*) may be affected by the proposed action, a revision of the conservation measures; hence, our previous analyses and conclusions stand regarding other listed species included in the original Biological Opinion (see the Altar Valley Fire Management Plan Biological Opinion issued December 15, 2008 (consultation number 22410-2005-F-0002)). The NRCS determined that the proposed action may adversely affect the endangered Pima pineapple cactus.

On September 3, 2013, we completed the reinitiation of section 7 consultation with the NRCS on the AVFMP with regard to a proposed change in the survey and monitoring approach for the Pima pineapple cactus for the implementation of the West Mill Burn on the King's Anvil Ranch. This is one of five existing burn plans (created using National Fish and Wildlife Foundation grant funding) which will be implemented under the AVFMP (Consultation Number 22410-2005-F-0002R1). Because of the value of the proposed survey and monitoring approach in helping us understand the effects of fire on the Pima pineapple cactus, we were supportive of the revised survey and monitoring approach and found that such a revision would not jeopardize the continued existence of the Pima pineapple cactus. We also anticipated that increasing the number of burns that would consistently implement the revised survey and monitoring approach would be necessary in order to get an adequate set of results to analyze to be able to appropriately draw conclusions related to the effects of fire on the Pima pineapple cactus. Based on this anticipated need, we included the following language in our September 3, 2013 Biological Opinion:

“The proposed action addressed by this reinitiation is the revision of the conservation measures related to the Pima pineapple cactus which represents a change to the original December 15, 2008 BO. The rest of the proposed action remains as described in the original December 15, 2008 BO. The revisions analyzed in this BO are specific to the West Mill Burn that will occur on the King's Anvil Ranch under the AVFMP. However, subsequent burns proposed under the AVFMP and covered by the original BO may also incorporate the approach outlined in this reinitiation if deemed appropriate by the NRCS and FWS. Correspondence between FWS and NRCS confirming the use of this approach for future burns shall provide coverage for these burns by this reinitiation. If such an approach is not appropriate, future burns will be required to comply with the terms of the original December 15, 2008 BO.”

Therefore, reinitiation of section 7 consultation on the AVFMP is not necessary if both of our agencies confirm that the Pima pineapple cactus survey and monitoring approach in the September 3, 2013 BO is appropriate for individual burns covered under the AVFMP. Based on your correspondence of April 15, 2013 (related to the proposed Las Delicias Burn) that outlined your intent to implement this revised survey and monitoring approach on the Las Delicias Burn, as well as discussions at the Altar Valley Conservation Alliance Spring Burn meeting, held on March 4, 2013, and the coordination meeting held in the field on March 25, 2013, it is our understanding that you are confirming that the revised survey and monitoring approach is appropriate for the Las Delicias Burn. By this letter, as well as our input at the above-mentioned meetings, we are confirming that we are also supportive of using the revised approach for the Las Delicias Burn. Therefore, the actions associated with the Las Delicias Burn are covered under the existing September 3, 2013 Biological Opinion, Consultation Number 22410-2005-F-0002R1.

NRCS, AVCA, and FWS will continue to coordinate implementation of this revised survey and monitoring approach throughout the Altar Valley to facilitate our understanding of the effects of fire on the Pima pineapple cactus on a broader scale, as well as to assess the effectiveness and need for survey and monitoring requirements as part of the AVFMP and the associated Biological Opinion.

For further information, please contact Scott Richardson of our Tucson Suboffice at (520) 670-6150 (x242) or Jean Calhoun (x 223). Please refer to the consultation number, 22410-2008-F-0002-R1 in future correspondence concerning this project.

Sincerely,

*/s/ Jean Calhoun for*  
Steven L. Spangle  
Field Supervisor

cc (hard copy):

Field Supervisor, Fish and Wildlife Service, Phoenix, AZ (2 copies)  
Jean Calhoun, Assistant Field Supervisor, Fish and Wildlife Service, Tucson, AZ  
Sally Flatland, Refuge Manager, Buenos Aires National Wildlife Refuge, Sasabe, AZ  
Las Delicias Ranch, Altar Valley, AZ (Attn: Walter Lane)

cc (electronic copy):

State Biologist, Natural Resources Conservation Service, Phoenix, AZ (Attn: Stu Tuttle)  
District Conservationist, Natural Resources Conservation Service, Tucson, AZ  
(Attn: Kristen Egen)  
Altar Valley Conservation Alliance, Three Points, AZ (Attn: Mary Miller)  
pep@azgfd.gov, Arizona Game and Fish Department, Phoenix, Arizona  
Regional Supervisor, Arizona Game and Fish Department, Tucson, AZ (Attn: John Windes)