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MEMORANDUM

To: District Manager, Phoenix District Office, Bureau of Land Management, Phoenix, Arizona

From: Field Supervisor, Ecological Services, FWS, Phoenix, Arizona

Subject: Biological Opinion

This is in response to your request of July 3, 1984, for formal Section 7 consultation, as provided by the Endangered Species Act of 1973 (as amended) on the Habitat Management Plan (HMP) for the Peebles Navajo Cactus, (Pediocactus peeblesianus var. peeblesianus), an endangered species. The HMP is for Bureau of Land Management (BLM) lands in Navajo County, Arizona.

The following background information and biological opinion are based on information furnished by BLM, data in our files, and conversations with various individuals familiar with the species and the project site.

Background Information

Peebles Navajo Cactus is a small, obscure cactus known from a few small populations in the vicinity of Holbrook and Joseph City, Navajo County, Arizona. Restricted to a specific soil type and flat or slightly sloping terrain, the cactus is limited to a small geographic area within the region. More specific information on the habitat requirements and the presently known distribution of this cactus can be found in the Peebles Navajo Cactus Recovery Plan (Phillips et. al. 1984).

Of the known distribution, 70% of the habitat is on private or State of Arizona lands. The remaining 30% is on BLM land. Gravel mining operations, construction activities, trampling by livestock, Off-Road Vehicle (ORV) use, illegal collection, and possible predation by rodents and lagomorphs are the major threats to both individual cacti and their habitat.

In the Recovery Plan, the BLM was assigned certain tasks and responsibilities to promote the recovery of the cactus. The HMP was developed to address these specific tasks on the 420 acres of BLM land that contains either populations of the cactus or potential habitat. Planned actions under this HMP are:

1. Construction of a 30 acre exclosure around the 2 populations of Peebles Navajo Cactus known to occur on BLM land to protect the cacti from livestock and ORV use.
2. Withdrawal of a 420 acre parcel under the mining laws to protect the cactus and its habitat from surface disturbances associated with mining operations.
3. A 10 year monitoring program of populations on BLM land to provide information of life history and population trends of the cactus.
4. An extensive inventory of BLM lands within potential Peebles Navajo Cactus habitat to attempt to locate other populations of the cactus. Any new populations would be managed under the HMP.
5. A program of aerial surveillance to monitor human use of the 420 acre parcel for signs of illegal collecting and extensive ORV use.
6. Maintenance of existing fence lines to discourage ORV access to the parcel. If aerial surveillance shows considerable ORV use of the parcel, a closure will be considered.
7. Fecal analysis of both lagomorph and rodent samples to determine the importance of Peebles Navajo Cactus in their diets.
8. Retention by BLM of title to all public lands with suitable habitat for Peebles Navajo Cactus and consideration of acquisition through exchange of adjacent state or private lands containing populations of the cactus.

Biological Opinion

It is our biological opinion that implementation of this HMP is not likely to jeopardize the Peebles Navajo Cactus, but will promote the conservation of the species and, therefore, constitute a beneficial action.

Further consultation is not required on this HMP unless new species are listed that occur within the HMP area, new information becomes available that reveals impacts not considered in this opinion, or the area is not withdrawn from

operation of the mining laws. Any activity involving mining claims or operations that would result in any surface disturbance would be subject to Section 7 consultation on that specific activity.

We thank you for your interest in conserving endangered and threatened species.

cc: Director, Arizona Game and Fish Department, Phoenix, Arizona
Director, FWS, Washington, D.C. (CPS)
Regional Director, FWS, Albuquerque, New Mexico (AHR)
Regional Director, FWS, Albuquerque, New Mexico (SR)

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