



September 13, 2015

Public Comments Processing  
Attn: **Docket No. FWS-HQ-ES-2015-0016**  
Division of Policy, Performance, and Management Programs  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike, MS: BPHC  
Falls Church, VA 22041-3803

***Re: Revisions to the Regulations for Petitions; Proposed revision to 50 CFR 424.14 – Petitions; Docket No. FWS-HQ-ES-2015-0016***

The Pima Natural Resource Conservation District (District) and Southern Arizona Cattlemen’s Protective Association (SACPA) herein provide comment on the proposed rule promulgated by the U.S. Fish and Wildlife Service (Service) (FWS-HQ-ES-2015-0016; NOAA\_FRDOC\_0001\_3492; FR 2015-17580).

We appreciate that the Service is attempting to remedy a very serious problem and we also appreciate being given the opportunity to comment on the proposed solution

The proposed rule revisions that the Service proposes could dramatically improve the quality of the Service’s decisions, dramatically reduce future occurrences of frivolous endangered species petitions, and relieve the Service and the public of excessive workloads that in the past have resulted in misguided court settlements and unnecessary regulations that directly threaten the livelihoods and well being of the District’s cooperators and SACPA’s members.

The District is both a local unit of Arizona government with elected officials and an Arizona agency. The District operates under the authority and direction of the Arizona State Natural Resources Commissioner per A.R.S. Title 37, Chapter 6. The mission of the Pima Natural Resource Conservation District as defined by the Arizona Revised Statutes (A.R.S. §37-1001) is “to provide for restoration and conservation of lands and soil resources, preservation of water rights, and control and prevention of soil erosion; and thereby conserve natural resources, conserve wildlife, protect the tax base, protect public lands, and protect and restore the state’s rivers, streams and associated riparian habitats including fish and wildlife dependent on those habitats in such manner to protect and promote public health, public safety and the general public welfare.” The Arizona Revised Statutes additionally recognize Arizona’s Natural Resource Conservation Districts as having special expertise in soil and water conservation.

The District serves voluntary cooperators that reside within the geographic boundaries of Pima County, Arizona, excluding the sovereign lands of the Tohono O’Odham Nation. A Pima NRCD cooperator is any person who has entered into a voluntary cooperative agreement with the Pima NRCD for the purpose of protecting, conserving and practicing wise use of the natural resources under his or her control. Cooperators may include landowners, lessees, managers and private or governmental entities interested in appropriate, scientifically supported natural resources management in southern Arizona.

The Southern Arizona Cattlemen’s Protective Association (SACPA) is a 502(c)4 non-profit corporation that represents cattlemen from Pinal, Pima and Santa Cruz Counties in Arizona.

The District and SACPA welcome the proposed rule change, but also provide suggested edits herein.

We request that in proposing future changes to existing regulations, the Service employ the formatting technique that we have provided herein so that anyone reading the proposed rule change can instantly understand what the original rule states and exactly what changes are proposed. The proposed formatting would save the Service and everyone else a great deal of labor and reduce confusion without altering the content of the proposed changes.

We have entered our comments and suggested edits directly on the proposed format, but wish to preface that portion of our comments with some explanation.

The District and SACPA, in responding to previously proposed listing and critical habitat decisions, have frequently encountered unreasonable challenges in attempting to obtain and examine cited sources. In many cases cited sources have been unavailable anywhere. In others, they have required long trips to public libraries or fees to purchase documents online. This problem has required maximum effort and unreasonable costs under unreasonably short deadlines, simply to examine the literature sources underlying proposed regulations, both for accuracy of the literature and the Service’s faithfulness in presenting the cited literature. This diligence is a necessary step to intelligently make substantive, meaningful and worthwhile comment on proposed rules. We respond to proposed regulations in this manner to deter the potential infliction of unnecessary regulatory harm to our cooperators and members when it is based on inaccurate assumptions and/or data.

Most if all of our leadership, cooperators or members receives no compensation from anyone for responding to the ever-growing burden of defending their livelihoods against damage from inaccuracies contained in rushed federal regulations, lawsuit settlements, and inaccuracies in the cited materials they are founded upon. We therefore have had to either take substantial and significant amounts of time away from earning our livelihoods, or take substantial and significant amounts time away from our families, or spend substantial and significant sums of money hiring consultants and attorneys to respond on our behalf—or risk unjustified regulatory harm. Consulting fees for some of responses we have submitted to the Service within the last five years have run into tens of thousands of dollars. If our cooperators or members are unable to respond to proposed regulations or have someone respond on their behalf, frequently within tight deadlines, they might be exposed to unjustified costs related to overregulation.

The District and SACPA provide the Service evidence in numerous timely submitted responses to proposed rules for species listings and/or critical habitat designations for the Jaguar (Docket No. FWS-

R2-ES-2012-0042), the Southwestern willow flycatcher (Docket No. FWS-R2-ES-2011-0053; Vol. 76, No. 157 / Monday, August 15, 2011 / p. 50542 et seq.), the Chiricahua leopard frog (76 FR 50, 14126 et seq), the Sonoran Desert tortoise and the Spikedace and Loach minnow, and the Yellow-billed cuckoo (Yellow-billed Cuckoo Western DPS (*Coccyzus americanus*) Proposed Listing Rule October 3, 2013 *Federal Register*: 78:61621–61666), all of which comments are incorporated herein by reference.

The Service in the past has repeatedly proposed rules in the Federal Register that relied on petitioners' errant citations of pseudo-scientific literature that misrepresents its own citations. A very common issue is reliance on non-vetted n<sup>th</sup>-hand citations to citations that misrepresent primary data. For example, the listing of the Western Yellow billed cuckoo relied on a chain of five levels of misrepresented citations misrepresenting their own citations. The same problem occurred with both the listing and the critical habitat designation for the jaguar. Both relied heavily on inaccuracies, chain-cited endlessly from data errors that originated as long ago as 1858. As an example, the misspelling of one primary source author's name shows up today in nearly every new peer-reviewed paper that is published about jaguars in the United States, in addition to a plethora of much more substantive errors. A key flaw in modern published wildlife science is widespread failure to cite primary sources or to at least examine secondary sources for faithfulness to fact. When misrepresentations of fact form the basis of a costly regulation it destroys livelihoods, separates people from their heritage, and foments fully justified distrust of the federal government.

We therefore request the Service demand petitioners exclusively cite primary data and to make that primary data available to the Service and the public, online at no charge. This will allow the Service to place the research and data vetting workload directly on the shoulders of the petitioners while making the Service's and the public's own data-vetting process possible at minimal cost, and within a reasonable time frame.

We anticipate that the Service's proposed rule changes, in addition to the suggestions we offer here, will free the Service from being perpetually overwhelmed with frivolous listing petitions and unreasonable deadlines (the very tactic professors Cloward and Pivens promoted as a means of overthrowing the government). We believe the proposed rule could dramatically reduce the pointlessly overwhelming workload presently imposed on the Service (and by extension, the public and our cooperators and members) and hopefully re-introduce "best available science" as the basis for implementing the Endangered Species Act—as required by the Act.

What follows herein is the proposed rule change, formatted as we suggest be done with all proposed rule changes in the future, with our comments inserted in appropriate places. The formatting key is as follows:

- The existing rule is typed in black sans serif font.
- The Service's proposed insertions are in presented blue sans serif font, underlined.
- The Service's proposed deletions of text are presented as ~~striketrough~~.
- The District's proposed edits are presented in red.
- The District's and SACPAs comments are presented in *14 pt. italic font*.

## 50 CFR 424.14 - Petitions.

### § 424.14 Petitions.

~~(a) **General Ability to Petition.**~~ Any interested person may submit a written petition to the Secretary requesting that one of the actions described in § 424.10 be taken for a species. ~~Such a document must clearly identify itself as a petition and be dated. It must contain the name, signature, address, telephone number, if any, and the association, institution, or business affiliation, if any, of the petitioner. The Secretary shall acknowledge in writing receipt of such a petition within 30 days.~~

*Comment – We agree that single species petitions will be better.*

~~(b) **Petitions to list, delist, or reclassify species**~~ Requirements for Petitions ~~Such a document~~ A petition must clearly identify itself as such, and be dated, and contain the following information:

1) The name, signature, address, telephone number, if any, and the association, institution, or business affiliation, if any, of the petitioner;

*Comment: We agree.*

(2) The scientific and any common name of the species that is the subject of the petition. One and only one species may be the subject of a petition;

*Comment: We agree.*

(3) A clear indication of the administrative action the petitioner seeks (e.g., listing of a species or revision of critical habitat);

*Comment: We agree.*

(4) A detailed narrative justification for the recommended administrative action that contains an analysis of the information presented;

*Comment: We agree.*

(5) Literature citations that are **relevant to the species and** specific enough for the Secretary to locate the information cited in the petition, including page numbers or chapters as applicable;

*Comment: Generally, we agree. However, please change to require that citations must be exclusively to primary references (not citation of citations) and literature must be specifically relevant to the species.*

(6) Electronic or hard copies of any supporting materials (e.g., publications, maps, reports, letters from authorities) cited in the petition, or valid links to public Web sites where the supporting materials can be

[accessed; and](#)

*Comment: We agree, in general. However, supporting material must be available to the public online without a fee. If there is a fee, the petitioner must pay the royalty such that the agencies and public have free access.*

[\(7\) For a petition to list a species, information to establish whether the subject entity is a “species” as defined in the Act.](#)

*Comment: We agree.*

[\(8\) For a petition to list a species, delist a species, or change the status of a listed species, information on the current geographic range of the species, including range States or countries \*\*must be included.\*\*](#)

[\(9\) For any petition submitted to the U.S. Fish and Wildlife Service pertaining to species found within the United States, a certification:](#)

[\(i\) That a copy of the petition was provided to the State agency\(ies\) responsible for the management and conservation of fish, plant, or wildlife resources in each State where the species occurs at least 30 days prior to submission to the Service; and](#)

*Comment: Change to 90 days prior to submission and add that State agencies can request a time extension prior to submission to the Service. There should be no restrictions on the State agencies distributing the petition such that the State can gather all necessary information to inform its action. In addition, add a requirement that within 14 days of acceptance of a petition, the Secretary will publish it in the Federal Register.*

[\(ii\) That the State agency\(ies\) either:](#)

[\(A\) Provided to the petitioner data or written comments regarding the](#)

[accuracy or completeness of the petition, and all those data or comments have been clearly labeled as such and appended to the petition; or](#)

[\(B\) Did not provide to the petitioner in response any data or written comments regarding the accuracy or completeness of the petition.](#)

[\(10\) Certification that the petitioner has gathered all relevant information \(including information that may support a negative 90-day finding\) that is reasonably available, such as that available on Web sites maintained by the affected States, and has clearly labeled this information and appended it to the petition.](#)

*Comment: We agree. However, add that the information must be available to agencies and the public free of charge.*

[\(c\) Types of information to be included in petitions to add or remove species from the lists, or change the listed status of a species. The Secretary’s determination as to whether the petition provides substantial](#)

information that the petitioned action may be warranted will depend in part on the degree to which the petition includes the following types of information; failure to include adequate information on any one or more of the following (except paragraph (5)) may result in the Secretary finding that the petition does not present substantial information:

(1) Information on current population status and trends and estimates of current population sizes and distributions, both in captivity and the wild, if available;

*Comment: We agree, but a description of methodology used for estimating population size should also be included.*

(2) Identification of the factors under section 4(a)(1) of the Act that may affect the species, a detailed description of how these factors affect the species, and where these factors are acting upon the species;

*Comment: We agree, with edits.*

(3) Whether any or all of the factors alone or in combination identified in section 4(a)(1) of the Act may cause the species to be an endangered species or threatened species (i.e., place the species in danger of extinction now or in the foreseeable future), and, if so, how, including a description and data showing of the magnitude and imminence of the threats to that specific species;

*Comment: We agree, but “boilerplate” lists should not be accepted. Data specifically linking the stated threats to that particular species should be required.*

(4) Information on adequacy of regulatory protections and conservation activities initiated or currently in place that may protect the species or its habitat in the United States or other countries including but not limited to protected areas such as lands within habitat conservation plans, wilderness areas, wilderness study areas, areas protected for wilderness characteristics, tribal lands, parks and monuments at all levels of government, and lands under conservation easements; and

*Comment: We agree as amended with inserted edit.*

(5) Except for petitions to delist, information that is useful in determining whether a critical habitat designation for the species is prudent and determinable (see § 424.12), including biological, social and economic ~~information~~ data relevant to ~~on~~ recommended boundaries and physical features and the habitat requirements of the species and how a critical habitat designation might affect other species; such information, however, will not be a basis for determining whether the petition has presented substantial information that the petitioned action may be warranted.

*Comment: We agree with the above if edits in red are included. We believe, for example, that designating critical habitat in a riparian area to stimulate tree growth for a bird species could have a detrimental effect on a warm water fish species by creating a cold water environment. In contrast, designating a riparian area as critical habitat for a warm water fish species could have a detrimental impact on birds and macrobiotic insects if rotenone is used.*

(d) Additional information to include in petitions to revise critical habitat. The Secretary's determination as to whether the petition provides substantial information that the petitioned action may be warranted will depend in part on the degree to which the petition includes the following types of information; failure to include adequate information on any one or more of the following may result in the Secretary finding that the petition does not present substantial information:

(1) A description and map(s) of areas that the current designation:

(a) does not include that should be included, or

(b) that is included that should no longer be included, and

(c) the social and economic costs and benefits of designating or not designating these specific areas as critical habitat with full literature citations,

(d) the harmful impact that designating critical habitat may have on other candidate, threatened or endangered species; and other species of concern as identified by other local, state and federal agencies.

*Comment: See edits above in red, breaking the sentence into phrases for clarity. Recognize that a single-species focus can be detrimental to other species.*

Petitioners should include available data layers if feasible;

*Comment: We agree.*

(2) A description of the physical or biological features essential for the ~~conservation~~ survival of the species and whether they may require special management considerations or protection;

*Comment: Per the ESA, change "conservation" to "survival".*

(3) For any areas petitioned to be added to critical habitat within the geographical area occupied by the species at time it was listed, information from primary sources indicating that the specific areas contain the physical or biological features that are essential to the ~~conservation~~ survival of the species and may require special management considerations or protection. The petitioner should also indicate which specific areas contain which features;

*Comment: Per the ESA, change "conservation" to "survival" and specify that sources must be the primary sources (not citations of citations).*

(4) For any areas petitioned for removal from currently designated critical habitat within the geographical area occupied by the species at the time it was listed, information indicating that the specific areas do not contain features (including features that allow the area to support the species periodically, over time) that are essential to the ~~conservation~~ survival of the species, or that these features do not require special management consideration or protections;

*Comment: Per the ESA, change “conservation” to “survival”.*

(5) For any areas petitioned to be added to or removed from critical habitat that were outside the geographical area occupied by the species at the time it was listed, information from primary sources indicating why the petitioned areas are or are not essential for the ~~conservation~~ survival of the species; and

*Comment: Per the ESA, change “conservation” to “survival” and specify that sources must be the primary sources (not citations of citations).*

(6) ~~Information demonstrating that the~~ The petition shall includes a complete presentation of the relevant facts, including an explanation of what primary sources of information the petitioner consulted in drafting the petition. ~~, as well as any relevant information known to the petitioner not included in the petition.~~ Petitions will include an affidavit that to the best of the petitioners’ knowledge all relevant information, including reasons not to list the species or designate critical habitat, have been included in the petition.

*Comment: We agree with the above with the proposed edits.*

(e) Response to requests. (1) If a request does not meet the requirements set forth at paragraph (b) of this section, the Secretary will reject the request without making a finding, and will notify the sender and provide an explanation of the rejection. The Secretary will publish the rejection in the Federal Register.

*Comment: We agree, with edits.*

(2) If a request does meet the requirements set forth at paragraph (b) of this section, the Secretary will acknowledge, in writing, the receipt of a petition, within 30 days of receipt and publish the decision in the Federal Register.

*Comment: We agree, with edits.*

(f) Supplemental information. If the petitioner provides supplemental information before the initial finding is made and asks that it be considered in making a finding, the new information, along with the previously submitted information, ~~withdraws the initial petition.~~ The original petition with the supplemental information is treated as a new petition will and shall comply with all pre-submission requirements including State review. ~~that supersedes the original petition.~~ The statutory timeframes will begin when such supplemental information is received.

*Comment: We agree subject to addition of the requirement that the full State agency review period be started again if supplemental information is submitted.*

(g) Findings on petitions to add or remove a species from the lists, or change the listed status of a species.

(1) To the maximum extent practicable, within 90 days of receiving a petition to ~~list, delist,~~ add a species to the lists, remove a species from the lists, or reclassify change the listed status of a species, the Secretary ~~shall~~ will ~~shall~~ make a finding as to whether the petition presents substantial scientific or



commercial information indicating that the petitioned action may be warranted. The Secretary will promptly publish such finding in the Federal Register and so notify the petitioner.

*Comment: Change the first sentence back to “shall” per the ESA. The Service does not have authority to change the wording or intent of the ESA. Legally, “shall” has an imperative meaning that “will” does not.*

- (i) For the purposes of this section, “substantial scientific or commercial information” ~~is that amount of information~~ refers to credible reliable, repeatable and verifiable scientific or commercial information from primary, published sources in support of the petition’s claims such that would lead a reasonable person conducting an impartial scientific review to believe would conclude that the ~~measure~~ action proposed in the petition may be warranted. Conclusions drawn in the petition without the support of credible reliable, repeatable and verifiable published scientific or commercial information will not be considered “substantial information.”

*Comment: We agree. We recommend adding the above changes to strengthen. Memos of phone calls, for example, are not verifiable and should not be accepted unless a full transcript and digital recording are included.*

- (ii) The Secretary will shall consider the information referenced at paragraphs (b), (c), and (f) of this section. The Secretary shall may also consider information readily available in the agency’s possession at the time the determination is made in reaching his or her initial finding on the petition. The Secretary will shall not consider any supporting materials cited by the petitioner that are not provided to us by the petitioner in the format required at paragraph (b)(6) of this section or otherwise readily available to the Secretary in our possession.

*Comment: We agree. We recommend adding the above changes to strengthen.*

- (iii) The “substantial scientific or commercial information” standard must be applied in light of any prior determinations made by the Secretary for the species that is the subject of the petition. Where the Secretary has already conducted a status review of that species (whether in response to a petition or on the Secretary’s own initiative) and made a final listing determination, any petition seeking to list, reclassify, or delist that species will be considered a “subsequent petition” for purposes of this section. A subsequent petition provides “substantial scientific or commercial information” only if it provides sufficient new information or analysis not considered in the previous determination (or previous 5-year review, if applicable) such that a reasonable person conducting an impartial scientific review would conclude that the action proposed in the petition may be warranted despite the previous determination.

*Comment: We agree.*

~~The Secretary shall promptly publish such finding in the Federal Register and so notify the petitioner.~~

**(2)** ~~In making a finding under paragraph (b)(1) of this section, the Secretary shall consider whether such petition—~~

~~(i) Clearly indicates the administrative measure recommended and gives the scientific and any common name of the species involved;~~

~~(ii) Contains detailed narrative justification for the recommended measure, describing, based on available information, past and present numbers and distribution of the species involved and any threats faced by the species;~~

~~(iii) Provides information regarding the status of the species over all or a significant portion of its range; and~~

~~(iv) Is accompanied by appropriate supporting documentation in the form of bibliographic references, reprints of pertinent publications, copies of reports or letters from authorities, and maps.~~

~~The petitioner may provide information that describes any recommended critical habitat as to boundaries and physical features, and indicates any benefits and/or adverse effects on the species that would result from such designation. Such information, however, will not be a basis for the determination of the substantiality of a petition.~~

~~(2)(3) Upon making if a positive 90-day finding is made, under paragraph (b)(1) of this section, the Secretary ~~shall~~ will ~~shall~~ commence a review of the status of the species concerned, and shall make, ~~w~~Within 12 months of receipt of ~~such~~ the petition, ~~the Secretary will~~ shall ~~make~~ one of the following findings:~~

*Comment: We agree, but the language of the ESA is "shall."*

~~(i) The petitioned action is not warranted, in which case the Secretary shall promptly publish such finding in the *Federal Register* and so notify the petitioner.~~

~~(ii) The petitioned action is warranted, in which case the Secretary ~~shall~~ will ~~shall~~ promptly publish in the *Federal Register* a proposed regulation to implement the action pursuant to § 424.16 (/cfr/text/50/424.16); ~~of this part, or~~~~

*Comment: We agree but the language in the ESA is "shall."*

~~(iii) The petitioned action is warranted, but: ~~that—~~~~

~~(A) The immediate proposal and timely promulgation of a regulation to implement the petitioned action is precluded because of other pending proposals to list, delist, or change the listed status of a species; reclassify species, and~~

~~(B) Expeditious progress is being made to list, delist, or change the listed status of reclassify qualified species, in which case, such finding shall be promptly published in the *Federal Register* together with a description and evaluation of the reasons and data on which the finding is based. The Secretary will make a determination of expeditious progress in relation to the amount of funds available after complying with nondiscretionary duties under section 4 of the Act and court orders and court-approved settlement agreements to take actions pursuant to ~~S~~ection 4 of the Act.~~

*Comment: We agree.*

~~(3)~~ ~~(4)~~ If a finding is made under paragraph ~~(b)(3)(iii)~~ (g)(2)(iii) of this section with regard to any petition, the Secretary ~~will, shall~~ shall, within 12 months of such finding, again make one of the findings described in paragraph (g)(2) of this section ~~(b)(3)~~ with regard to such petition, ~~but no further finding of substantial information will be required.~~

*Comment; we agree but the statutory language of ESA says "shall."*

~~(h)(e)~~ Findings on petitions ~~Petitions to revise critical habitat.~~

**(c) Petitions to revise critical habitat.**

**(1)** To the maximum extent practicable, within 90 days of receiving a petition to revise a critical habitat designation, the Secretary ~~shall~~ will ~~shall~~ make a finding as to whether the petition presents substantial scientific ~~and commercial~~ information indicating that the revision may be warranted. The Secretary ~~shall~~ will ~~shall~~ promptly publish such finding in the *Federal Register* and so notify the petitioner.

*Comment: We agree. Please accept edits in red.*

- (i) For the purposes of this section, "substantial scientific and commercial information" refers to credible scientific information in support of the petition's claims such that a reasonable person conducting an impartial scientific review would conclude that the revision proposed in the petition may be warranted. Conclusions drawn in the petition without the support of credible scientific and commercial information will not be considered "substantial information."

*Comment: Per the ESA, add "commercial"*

(ii) The Secretary will consider the information referenced at paragraphs (b), (d), and (f) of this section. The Secretary ~~may~~ shall also consider other information readily available in the agency's possession at the time the determination is made in reaching its initial finding on the petition. The Secretary will not consider any supporting materials cited by the petitioner that are not provided ~~to us~~ by the petitioner in the format required by paragraph (b)(6) of this section or otherwise readily available in ~~our~~ the Secretary's possession.

*Comment: We agree. Please accept suggested edits.*

~~(2)~~ In making the finding required by paragraph ~~(c)(1)~~ of this section, the Secretary shall consider whether a petition contains—

~~(i)~~ Information indicating that areas petitioned to be added to critical habitat contain physical and biological features essential to, and that may require special management to provide for, the conservation of the species involved; or

~~(ii)~~ Information indicating that areas designated as critical habitat do not contain resources essential to,

~~or do not require special management to provide for, the conservation of the species involved.~~

- (2) ~~(3)~~ Within 12 months after receiving a petition found under paragraph (c)(1) of this section to present substantial information indicating that revision of a critical habitat [designation](#) may be warranted, the Secretary ~~shall~~ [will](#) ~~shall~~ determine how ~~he intends~~ to proceed with the requested revision, and ~~shall~~ [will](#) ~~shall~~ promptly publish notice of such intention in the *Federal Register*. [Such finding may, but need not, take a form similar to one of the findings described under paragraph \(g\)\(2\) of this section.](#)

*Comment: We agree. Please accept suggested edits. ESA language is "shall."*

~~(d)~~ [\(j\)](#) ***Petitions to designate critical habitat or adopt special rules.*** Upon receiving a petition to designate critical habitat or to adopt a special rule to provide for the conservation of a species, the Secretary ~~shall~~ [will](#) ~~shall~~ promptly conduct a review in accordance with the Administrative Procedure Act (5 U.S.C. 553) and applicable Departmental regulations, and take appropriate action.

*Comment: "shall" is the language used in the ESA.*

(j) Withdrawal of petition. A petitioner may withdraw the petition at any time during the petition process by submitting such request in writing. This request must include the name, signature, address, telephone number, if any, and the association, institution, or business affiliation, if any, of the petitioner. If a petition is withdrawn, the Secretary may, at his or her discretion, discontinue action on the petition finding, even if the Secretary has already made a positive 90-day finding.



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