



## CITIZENS COMMITTEE TO COMPLETE THE REFUGE

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May 13, 2016

**RE: Docket number FR-5173-N- 02**

**Draft Recovery Plan for the Central California Distinct Population Segment of the California Tiger Salamander  
(*Ambystoma Californiense*)**

Dear Mr. Kuyper,

This letter is submitted in response to the U.S. Fish and Wildlife Service (USFWS) Draft Recovery Plan (Recovery Plan) for the Central California Distinct Population Segment (DPS) of the California Tiger Salamander (*Ambystoma Californiense*).

We have long awaited the release of the Draft Recovery Plan for the Central California DPS. The Central Valley DPS was listed as “threatened” nearly twelve years ago and in the intervening years development, agricultural conversion of grazing lands and vernal pool complexes, and fragmentation of California tiger salamander (CTS) habitat have continued to consume and degrade the remaining CTS habitat. Based upon the information provided in the Draft Recovery Plan, the October 21, 2014, “California Tiger Salamander Central California Distinct Population Segment 5-Year Review: Summary and Evaluation” and other documents referenced in the Draft Recovery Plan, we have the following comments.

Delisting Criteria – Factor E:

Under Factor E, “Other Natural or Manmade Factors Affecting Its Continued Existence,” the Recovery Plan discusses mortality related to road crossings. We urge the U.S. Fish and Wildlife Service (Service) to incorporate under this discussion the direct and indirect mortality impacts related to the use of off-highway vehicles. The species account provided by the Service states, “Automobiles and *off-road vehicles kill significant number* of migrating California tiger salamanders, and runoff from roads, highways and agriculture may adversely affect them,” [emphasis added, [http://www.fws.gov/sacramento/es\\_species/Accounts/Amphibians-Reptiles/es\\_ca-tiger-salamander.htm](http://www.fws.gov/sacramento/es_species/Accounts/Amphibians-Reptiles/es_ca-tiger-salamander.htm)] yet only mortality due to highway traffic appears to be discussed.

The use of off-road vehicles in proximity to CTS breeding ponds and upland burrows may result in CTS mortality from direct contact with vehicles, or CTS may be crushed while in burrows. In addition, significant degradation of breeding ponds may result from mobilization of sediments following ground disturbance by off-highway vehicles, leading to reduction in the duration of ponding during the breeding season. The use of off-highway vehicles, or the construction of

dirt roads or trails, in areas where overland sheet flow (during the rainy season) is the primary source of hydrology for a breeding pond, may adversely alter the hydrological regime of the breeding pond. For these reasons, the adverse impacts of off-highway vehicles must be included in the discussion of threats under Factor E.

#### Delisting Criteria – Factor A:

The Recovery Criteria for Breeding Habitat appears to be based upon the relationship between the number of ponds present and the minimum surface area for each pond. The Recovery Plan states that for each preserve (of at least 3,398 acres), there must be a minimum of 4 ponds within the preserve with a minimum surface area for each pond of 0.9 acres, yielding a total minimum surface area of ponds for each preserve of 3.6 acres. The total minimum surface area of ponds decreases as the number of ponds within the preserve increases. We assume the use of the phrase “breeding habitat” pertains only to ponds that hold water of sufficient duration to allow CTS larvae to mature into juveniles that are then capable of dispersing from the pond to suitable terrestrial habitat. We suggest that this be made clear under this requirement. We also suggest there should be some preference for variability in the duration of ponding within the breeding ponds of a preserve. Climate change is mentioned as a factor that is now being considered a threat to CTS, in particular the adverse impacts of drought and increased temperatures on the native CTS. It would seem that requiring variability in the duration of ponding might provide more resilience for preserve populations. For example, even during drought years, deeper ponds (but not deep enough to persist year-round), could be capable of capturing and storing more runoff during infrequent and flashy rain events, thus providing sufficient time for maturation, while shallower ponds cannot.

#### Recovery Actions:

1.2.2 We concur that ensuring funding for maintenance of livestock ponds on protected habitat in perpetuity should be a Priority 1 action. The predictions of flashier and more intense rain events as a consequence of climate change pose real issues for the long-term sustainability of breeding ponds. Berms will erode with time or blow out during intense rain events. Sedimentation of ponds is another major concern and ponds will require sediment removal to retain the appropriate hydroperiods.

2.1.1 We agree targeted eradication of hybrid tiger salamander populations may be required and should be a Priority 1 action item. The Recovery Action states “Conduct targeted eradication of hybrid tiger salamander populations *when determined to be beneficial* to the DPS as a whole.” If this is the criteria, shouldn’t Recovery Action item 2.4 “Develop a genetic monitoring plan for each recovery unit” also be a Priority 1 action item? Would eradication be based on morphological features or the presence of paedamorphs? Or would eradication be conducted based upon genetic analysis?

2.4 We support the development of a genetic monitoring plan for each recovery unit. As stated above, we believe this should be a Priority 1 action. This plan should include identification of relatively isolated populations of CTS that should be protected and could serve as potential sources for the translocation mentioned in Recovery Action 2.2, if that action is implemented.

4.1.1 and 4.1.3 – These Recovery Actions pertain to the monitoring to detect disease outbreaks and the development of contingency plans to deal with disease outbreaks. These action items have received a Priority 3 ranking, we believe they warrant a Priority 2. While pathogen outbreaks have not been documented in the Central Valley DPS, they are known to be lethal to California tiger salamander, and the Recovery Plan acknowledges that if a population is infected with one of these diseases “it could quickly spread to an entire metapopulation since some individuals may not die, becoming

carriers of the disease and dispersing to other ponds where they will infect other individuals.” Contingency plans to deal with management and containment of disease outbreaks should be developed and continually updated.

7.1 Establish a database that tracks the amount of incidental take authorized through Section 7 and 10 of the Act should be higher in priority (Priority 3).

The 5-Year Review indicated that habitat loss that has been authorized through Section 7 from 2004 to 2012 amounts to 8,657 acres. What is of great concern is that 24,414 acres of “temporary habitat loss” has also been authorized and there is no indication of the type of habitat impacted or extent to which that habitat has been “restored,” and if so, whether restoration is adequate to support CTS. Tracking of permanent and temporary impacts to CTS habitat should be a Priority 2 action because it can help to inform future Section 7 decisions, especially as to potential cumulative impact concerns within a given recovery unit. The tracking should include the type of CTS habitat impacted, and if temporary impacts are involved, an indication whether the restoration of CTS habitat has been successful.

7.3 – We urge the Service to work with responsible parties to expedite surveying lands for Central California tiger salamander in areas that have not been well surveyed. The conversion of grazing lands for development, vineyards, and other land uses continues at an alarming rate. It is important to identify lands that support California tiger salamander as quickly as possible to inform any local planning processes. The longer it takes to initiate and complete the survey work the more difficult it will be to reverse development plans or conversions that may be proposed.

One final comment is in response to the statement:

In some cases, the target for protected habitat specified in delisting criteria has already been met. For example, multiple management units within the Bay Area recovery unit (e.g. North Diablo, Northeast Diablo, and Northwest Diablo management units) and Central Valley recovery unit (e.g. Jepson Prairie, Concord/Livermore, San Luis NWR/Sandy Mush, and Merced management units) have sufficient amounts of habitat protected to satisfy or exceed criteria set forth in this Recovery Plan.

We agree acreage in combination with an appropriate number of breeding ponds is paramount to conserving this species. However, acreage alone does not infer sustainability of a population or protection from outside stressors (invasions, diseases, drought, etc.). Monitoring of the populations within the preserves and interpretation of data collected over time will demonstrate whether the acreages specified within the Recovery Plan are adequate to recover the species. We are additionally concerned, this statement may be misinterpreted to mean that protection of California tiger salamander habitat located outside the protected areas is not warranted and that impacts to uplands and breeding habitat need not be avoided. We suggest the Service add additional language that clarifies that the acreages currently identified for preservation are based upon best available science, but that monitoring and interpretation of that data will, in the end determine whether sufficient acreage has been protected.

The disclaimer to the Recovery Plan states that recovery plans are sometimes prepared with the assistance of recovery teams. Was a recovery team created and used to develop this particular recovery plan, and has the Draft Recovery Plan already received scientific peer review?

The Stepdown Narrative of this Draft Recovery Plan makes no reference to the formation of a Recovery Team or Recovery Implementation Team. Will such a team be created to coordinate, refine, and expedite recovery actions including potential reprioritization of research tasks? If not, who will perform such tasks and how will their suitability be vetted?

In summary, we are supportive of a Recovery Plan for the Central California DPS of the California tiger salamander. We have stated concerns we hope the Service will consider and incorporate into the Final Recovery Plan.

CCCR requests that we be kept advised of any future opportunities to provide comments. We also ask to be notified when the Final Recovery Plan has been published.

Thank you for the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink that reads "Carin High". The signature is written in a cursive, slightly slanted style.

Carin High  
Citizens Committee to Complete the Refuge Co-Chair