



Guidance for Submitting Comments on the:

Designation of Critical Habitat for the Georgetown and Salado Salamanders (85 FR 57578)

Deadline to Submit Comments: November 16, 2020

Submit Electronically: Go to <http://www.regulations.gov/> and search "FWS-R2-ES-2020-0048". On the resulting page, in the Search panel on the left side of the screen, under "Document Type" check the Proposed Rule box. You may submit a comment by clicking on "Comment Now!".

Submit by U.S. Mail: Public Comments Processing, Attn: FWS-R2-ES-2020-0048, U.S. Fish and Wildlife Service, MS: PRB/3W, 5275 Leesburg Pike, Falls Church, VA 22041-3803.

Background: The Bell County Adaptive Management Coalition has expended various resources with the overall goal of increasing knowledge of the Salado salamander and adding to its conservation. The Coalition's efforts have protected the salamander and its habitat, rendering a critical habitat designation for the Salado salamander unnecessary and *not* prudent.

The Coalition will highlight the following key points in their comment on the proposed critical habitat designation:

1. The Coalition finds the foundational science used in support of the surface and subsurface designations not consistent with available scientific literature, and concludes it should not be used as the basis for designating critical habitat;
2. The Coalition does not support water *quality* degradation as a factor considered for critical habitat designation because the Coalition has implemented and managed multifactorial research efforts and regulations that have improved the Salado salamander's water quality to stable conditions;
3. The Coalition does not support water *quantity* degradation as a factor considered for critical habitat designation because the Coalition has implemented research, regulations, and ordinances that address this concern. The result is managed spring flow with sufficient water quantity for the Salado salamander, invalidating the need for a critical habitat designation;
4. The Coalition believes that public identification of otherwise protected sites could increase impacts to the species and its habitat, in the form of site disturbance and species harassment. Critical habitat should not be designated to avoid this potential impact;
5. The Economic Analysis used by the Service, a combination of an Incremental Effects Memorandum (IEM) and Screening Analysis, was not inclusive for all anticipated impacts in Bell County. In addition, documentation was not provided concurrently with the proposed critical habitat designation; and,
6. Solana Ranch is a conservation easement in Bell County, monitored by The Nature Conservancy (TNC), that protects three springs with known Salado salamander populations. Due to successful management, designating critical habitat on Solana Ranch is not necessary and should not be included in the final critical habitat designation.