



## Bell County Adaptive Management Coalition

### Redesignation of Critical Habitat for the Georgetown and Salado Salamanders

**Background:** In 2012, the U.S. Fish and Wildlife Service (FWS) proposed to list the Georgetown and Salado salamanders as *endangered*, and designate 1,031 acres (ac) of critical habitat for the Georgetown salamander, and 372 ac for the Salado salamander in Bell and Williamson Counties, Texas (77 FR 50768). While both species were eventually listed as *threatened* in 2014, critical habitat was never finalized (79 FR 10235).

In 2019, a well-known environmental organization, the Center for Biological Diversity, filed a lawsuit challenging FWS' failure to designate critical habitat for both species (Center for Biological Diversity, Case 1:19-cv-01607). Subsequently, a Stipulated Settlement Agreement was made on Feb 26, 2020, requiring FWS to propose critical habitat by Aug 12, 2020, and finalize it by Aug 12, 2021 (Center for Biological Diversity, Case 1:19-cv-01607-KBJ).

On Sept 15, 2020, FWS proposed 732 ac of critical for the Georgetown salamander, and 787 ac for the Salado salamander (85 FR 57578). In total, this redesignation increased 116 ac from that originally proposed in 2012. The public comment period is 60 days, ending on Nov 16, 2020.

**Coalition's Efforts:** Since 2012, the Bell County Adaptive Management Coalition (Coalition) has expended various resources on this topic, with the overall goal of increasing scientific knowledge of the Salado salamander, and adding to its conservation. The combined effects of the Coalition's efforts have protected the Salado salamander and its habitat, rendering a critical habitat designation unnecessary and *not* prudent. The Coalition has prepared a comment to submit in response to this redesignation, to include the following main points:

1. Foundational science used in support of the designations is not consistent with available literature, and should not be used as the basis for designating critical habitat;
2. Water *quality* degradation should not be a factor considered for this designation because the Coalition continues to implement and manage research efforts and regulations that have improved water quality to stable conditions;
3. Water *quantity* degradation should not be a factor considered for this designation because the Coalition continues to implement research, regulations, and ordinances that maintain sufficient water quantity for the Salado salamander;
4. Public identification of sites could increase impacts to the species and its habitat (i.e. site disturbance, species harassment, etc.);
5. The associated Economic Analysis was not inclusive for all anticipated impacts in Bell County; and,
6. Salado salamander sites located on Solana Ranch, a conservation easement in Bell County monitored by The Nature Conservancy (TNC), should not be included in this designation because of the existing, successful management by TNC.