

# STEWARDS OF THE SEQUOIA

Division of CTUC non profit 501c3  
PO Box 1246  
Wofford Heights CA 93285

June 24, 2013

Public Comments Processing Attn: FWS-R8-ES-2012-0100  
Division of Policy and Directives Management US Fish and Wildlife Service  
4401 N Fairfax Drive, MS 2042-PDM  
Arlington, VA 22203

Re- Comment on proposed listing of Frog & Toad Docket No. FWS-R8-ES-2012-0100

To Whom It May Concern,

We appreciate the opportunity to submit comments and information concerning the proposed rules to list as endangered/threatened, and to designate critical habitat for, the Sierra Nevada Yellow-Legged Frog (*Rana Sierrae*), Northern Distinct Population Segment of the Mountain Yellow-Legged Frog (*Rana Muscosa*) and the Yosemite Toad (*Anaxyrus Canorus*), as published in the Federal Register / Vol. 78, No. 80 / Thursday, April 25, 2013.

1. The proposed designation of 2 million acres of critical habitat is not appropriate since there are only 1320 acres of wetlands where the species habitat is located within the proposed area of concern.
2. The Proposed action will not accomplish or help in the goal of protecting the species since the primary threats to the species are fungus and non native trout stocking.
  - a. The ABSTRACT of Voyles plainly states: "The disease chytridiomycosis is responsible for declines and extirpations of amphibians worldwide." (See also Scott 1993; Berger et al.1998; Lips 1999.)
  - b. The U.S. National Park Service site states that trout depredations and fungus are causes. Fish removal began in 2001 and ended in 2004. Frogs then increased in one location from about 190 to 18,800, a 10,000 percent increase! Also, frogs started moving into adjacent lake habitats, and it is stated that "the natural balance has been restored for...the Yellow-legged frogs."
3. The proposed action has failed to consider the economic impacts of the listing.
4. The actual habitat wetland areas are already under adequate protection in Wilderness and National Parks and do not need further protection such as the proposed action.
5. There is no definitive data showing any negative impacts to the species from human activities, recreation, roads, grazing or logging. The proposed action would needlessly restrict these activities causing huge negative impacts on the economy and the public.
6. According to Roland Knapp, researcher, amphibian habitat is NOT degraded, and is in fact, essentially unchanged
7. Appendix A of the Proposal states there is no correlation to grazing: "Recently published studies of livestock grazing impacts on the Yosemite toad found no detectable effects of grazing treatment on the Yosemite toads or their most preferred habitats within meadows,

no benefits from partial meadow fencing, and concluded that toad occupancy and survival are more directly correlated with meadow wetness than the intensity of cattle use" (McIlroy et al. 2012; Roche et al. 2012a and 2012b.)

8. Both frog and toad populations are recovering and stabilized according to the Proposal's Appendix A
  - a. "...frogs are well distributed and occupy their historic range in numbers that reflect a STABLE AND INCREASING population...Re-introduced populations are resistant to chytrid fungus and are stable."
  - b. Toad habitat stretches from the Blue Lakes region north of Ebbetts Pass (Alpine Co.) south to three miles south of Kaiser Pass in the Evolution Lake/Darwin Canyon area (Fresno Co.). Under Proposals Appendix A, Desired Condition, it is stated "Remaining population centers are STABILIZED and numbers are increasing."

The proposed action should be withdrawn since

- It fails to address the purpose and need
- The data does not indicate the need for the listings, closures or restrictions.
- The data indicates the species are recovering with existing programs and protections

Failing that the proposed action should be modified to cover actual habitat area of 1320 acres of wetlands instead of 2 million acres.

All references to the negative impacts of roads, logging and grazing should be removed from the proposed action since there is no data to support this.

If Fish and Wildlife wish to continue with the existing proposal or any restrictions or closures then a full economic impact study for the proposed action must be completed and the massive negative economic effects considered prior to drafting the final action.

Sincerely,

Chris Horgan  
Executive Director  
Stewards of the Sequoia  
Division of CTUC 501c3 non profit  
[chris@stewardsofthesequoia.org](mailto:chris@stewardsofthesequoia.org)

Literature Cited-

Vredenburg VT; Knapp RA et al. (2010): Dynamics of an Emerging Disease Drive Large Scale Amphibian Population Extinctions;  
Briggs CJ; Knapp RA; Vredenburg VT (2010): Enzootic and Epizootic Dynamics of the chytrid fungus pathogen of amphibians and  
Voyles J., Vredenburg VT et al., (4/25/12): Pathophysiology in Mountain Yellow-Legged Frogs during a Chytridiomycosis Outbreak.  
McIlroy et al. 2012; Roche et al. 2012a and 2012b  
Scott 1993; Berger et al. 1998; Lips 1999.)

*"Since being founded in 2004, Stewards of the Sequoia continues to be the largest on-the-ground organization of volunteers in the Sequoia National Forest. Our crews have maintained over 2100 miles of trails and have planted hundreds of trees in reforestation projects. We represent in excess of 2500 members whose activities include camping, hunting, fishing, hiking, mountain biking, motorized recreation, boating, windsurfing, rock climbing and horse riding"*

Promoting Responsible Recreation & Environmental Stewardship