

**Phoonswadi-Brewer, Sean**

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**From:** Lander RMP  
**Subject:** Lander RMP comments

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**From:** Debra Patla [mailto:dpatla@hughes.net]  
**Sent:** Thursday, January 19, 2012 5:01 PM  
**To:** BLM\_WY\_LRMP\_WYMail  
**Subject:** Lander RMP comments

To: Lander Field Office, Project Manager  
 Submitted by:  
 Debra Patla  
 PO Box 420, Moran, WY 83013  
 Date: Jan 19, 2012

Thank you for extending the public comment period. My comments follow.

Comments on Amphibians

I am a biologist (MS degree level), and I have been engaged in research, surveys, and monitoring of amphibians in northwest Wyoming since 1993. I have not conducted field work on the Lander BLM district, but I reviewed the RMP/EIS with regards to consequences and conservation of amphibians in the project area.

I find the RMP/EIS grossly deficient for this class of animals. Which amphibian species occur? There are different answers on pages 361 (tiger salamander, plains spadefoot toad, and boreal chorus frog) and page 374 (northern leopard frog, Great Basin spadefoot toad, boreal toad, and spotted frog). Appendix P uses out-dated common and scientific names, some of which were changed formally in 2008 (Crother 2008, reference at end of letter). The summary paragraph on p. 361 reveals carelessness or ignorance, e.g., referring to “Tiger salamander newts” (a newt is a different amphibian species, not a life stage!), and stating that “Tiger salamanders occur in most habitats with non-flowing water nearby”, and overwinter in “cellars”.

I fear that BLM may be willing to sacrifice this class of animals. Page 362 discloses, “The declining condition of many riparian-wetland areas, combined with drought, has adversely impacted amphibian populations and populations are likely on a downward trend.” Will amphibians survive the period covered by this RMP, considering development, livestock grazing, declines in surface water quantity and quality, drought and climate change, and BLM’s lack of information? Are you legally and morally free to cause local and perhaps regional extinctions of native animals? I urge you to seek to reverse or mitigate the declining condition of many riparian-wetland areas on BLM land. The EIS needs to disclose which amphibian species are declining or expected to decline under the RMP.

Conservation of amphibians on BLM lands requires knowledge of species occurrence and their critical habitats and movement patterns. Amphibian species in Wyoming rely on quiet, non-flowing water bodies for egg deposition and larval development. Post-metamorphic amphibians disperse away from the ponded water, spending their adult lives (other than breeding periods) in a variety of upland, riparian, or moist habitats. While sharing a basic need for wetland breeding sites, different amphibian species have different ecological relationships and behavioral patterns.

The 500' buffer zone around riparian areas in Alternative D may be sufficient to conserve some resident amphibian populations, but the 1/4 mile buffer in Alternative B is much safer, particularly because it is accompanied by the stipulation requiring “surveys and subsequent mitigation, if required, for all BLM Sensitive Species in a project area before authorizing surface-disturbing and disruptive activities”. As a biologist, I strongly advise adopting Alternative B’s standards with regards to wetland buffers and site reviews for all cases where proposed activities could occur in proximity to wetlands. You cannot reliably protect sensitive

amphibian species without site-specific surveys and on-the-ground assessments.

If you adopt Alternative D, much depends on how BLM interprets, implements, enforces, and monitors the 500' buffer zone.

-- Do the protected riparian zones include ponds, ephemeral pools, intermittent streams, and man-made features such as reservoirs and stock ponds? If not, amphibian breeding sites (critical for all populations) could be destroyed or damaged. Please note that NWI or other mapping tools can miss small features or be out of date. Small features are easy to overlook but can be vital for amphibians. Please ensure that all wetlands, including small currently unmapped wetlands, are protected.

--Will the buffer zones prohibit road construction (and reconstruction) and operation of machinery? Amphibians are subject to crushing by vehicles.

I am also worried about cases where roads are built between riparian corridors, resulting in habitat fragmentation and road mortality when amphibians attempt to move among habitat patches.

--The lack of buffer zones in the DDA sounds like a disaster for amphibian populations in these large areas. The RMP needs measures to protect amphibians in these areas. The EIS needs to disclose and mitigate for the potential eradication of amphibians and their habitat.

Amphibians are not spread out evenly across potentially suitable habitat. Surveys for amphibians elsewhere in northwest Wyoming indicate 'hot spots' where a local population breeds annually for many years or even decades, successfully producing offspring, some of which may disperse and colonize new areas if they become available. The loss of such a source population can be catastrophic for the persistence of the species in an area. Many amphibians have strong site-fidelity to breeding and over-wintering sites. In addition, the qualities that make an area suitable for an amphibian population may not be obvious; you cannot assume that a protected site somewhere else will mitigate for the loss of an actual site.

Thus, I strongly recommend that the BLM Lander Field undertake amphibian inventory, so as to identify which species are present on the district and to work towards identifying your source populations. Of the sensitive amphibian species, presumably, Columbia spotted frogs and boreal toads are confined to the Dubois area if present; while Great Basin spadefoots and northern leopard frogs could occur in the rest of the district. Observations should be documented and records maintained, so that the information is not lost with personnel changes at Lander BLM.

Furthermore, each species should be monitored annually, at one or more breeding sites. This information will be valuable in keeping your biologists or technicians familiar with the species, their active periods (e.g., timing of breeding and metamorphosis) and ecological relationships. If possible, monitoring sites should be established in areas of management concern so that informed decisions can be made about proposed actions. Baseline monitoring sites, away from threats, will also provide useful insights that can be applied when amphibians are known to occur in areas where they may be threatened by human activities or livestock.

The RMP should ensure that surveys for sensitive amphibian species in project areas are conducted at suitable times. Amphibians are typically inconspicuous except during the breeding season and while larvae are present. Some species are easiest to find at night (e.g., spadefoots call during rainy nights in May or June), while Columbia spotted frogs (which call very softly if at all) are most often observed during the warm daytimes. Monitoring programs in Yellowstone and Grand Teton national parks emphasize daytime surveys for larval populations (<http://www.greateryellowstonescience.org/topics/biological/amphibians/projects/monitoring>).

Another concern for amphibians is the use of pesticide and herbicides. Amphibians have permeable skin, which makes them vulnerable to chemicals. Furthermore, the inactive ingredients in some formulations is dangerous to amphibians (e.g., the surfactants in pesticides or herbicides). Chemicals applied to livestock (e.g., to prevent worm infestation) may also be dangerous to amphibians. The RMP/EIS should prescribe the use of chemicals that are known to be safest for amphibians (and other vulnerable wildlife such as songbirds), and ban the use of the most harmful chemicals.

“Working with stakeholders to control grasshoppers and Mormon crickets would beneficially impact wildlife species in all statutory categories because infestations can adversely impact wildlife habitat quantity and

quality.” (P. 795) I find this a very rash statement. What is your evidence? How many beneficial insect species will be negatively affected by such control, with what consequences for amphibians, reptiles, and songbirds?

I also urge you to conduct inventory for reptile species. Information in the RMP is scant. Please note that garter snakes most often occur near water, so that by protecting amphibians you may also protect this species and possibly some others.

Following are some comments on topics other than amphibians.

I strongly support closing Dubois Badlands, Whiskey Mountain, and Copper Mountain to motorized travel. I urge you to ensure that adequate enforcement strategies are included in the RMP. These areas should also be closed to mechanized use. Mechanized use (e.g., mountain bikes) is not compatible with Wilderness, and to allow it in the WSA is to allow a degradation of wilderness quality. Mountain bikes disturb wildlife more than hikers, because of their speed and the greater distances covered, and their unnatural profiles. Mountain bikes can degrade the experience of other recreationists, who seek the traditional values, sights and sounds of Wilderness (at odds with the speed and shape of mountain bikes, the bright synthetic colors worn by riders, and their close-focus on the ground in front of their front wheel).

My preference would be to close all 8 WSAs to mechanized travel, as in Alternative B. This makes sense in an era where burning fossil fuels as a recreational pursuit becomes more and more questionable. If BLM keeps roads and routes open in WSAs, you need to show how you will maintain them and keep them from spreading out, and how you will monitor and restore areas that become degraded due to motorized/mechanized use.

As a biologist and resident of northwest Wyoming, I strongly support Alternative D’s approach of closing the entire Dubois area to oil and gas leasing. This area is incredibly rich in wildlife, and vital to sustaining healthy populations of species in the region that depend on the area for winter range. Protecting BLM land in the Dubois area complements land and wildlife conservation efforts in the region as implemented by many other federal and state agencies, non-profits, and private individuals.

The Little Red Creek complex LWC (lands with wilderness characteristics) should be closed to both mechanized and motorized use, which are not compatible with protecting bighorn sheep.

Thank you for expanding the East Fork ACEC, for the benefit of wildlife and habitat conservation. I urge your biologists to take another look at this area since the wildfires in 2011. It may be necessary to expand the ACEC or alter the boundaries to mitigate for changes caused by the fire; e.g., loss of mature conifers that provided thermal or hiding cover.

Within ACECs, BLM should limit motorized and mechanized use to designated routes. This is the modern view of land management adopted by the US Forest Service; BLM should adopt this policy as well.

I urge BLM to retain, expand, and create new ACEC as per Alternative B. Unfortunately, it is highly likely that threats to wildlife and their habitats will exceed your current expectations in the coming decade, due to climate change, wildfire, wildlife diseases, and the explosion of oil/gas development in Wyoming and adjacent states. It is also vital to protect cultural sites that are important to the tribes.

I am concerned about the future of sage grouse in Wyoming. The Governor's Greater Sage Grouse Core Areas on BLM lands should be closed to all oil and gas leasing. We cannot retain this species if federal agencies do not cooperate with the state’s habitat protection plans. The longer that BLM stalls and resists protection for this species, the worse the situation will become!

As a final comment, BLM should be prudent, envisioning long-term protection for the land...what will the land look like in 7 generations; will it be degraded or fully functional? I urge you to err on the side of conservation rather than its opposite...restoration is much more difficult and expensive than protection. Unsustainable use of resources harms our nation in the long term. The dramatic decline of some wildlife species (mule deer, sage

grouse), and poor air and water quality in parts of Wyoming are signs that BLM and other agencies have fallen short in their responsibilities of caring for the public's land. I exhort you to protect and defend our beloved land.

Thank you for considering my comments.

Sincerely,

Debra Patla

#### Reference

Crother, B.I. (Committee chair) 2008. Scientific and standard English names of amphibians and reptiles of North America north of Mexico, with comments regarding confidence in our understanding. 6th edition. Herpetological Circular No. 37, published January 2008. Society for the Study of Amphibians and Reptiles. <http://www.ssarherps.org>.