

Data Submitted (UTC 11): 11/5/2021 11:36:22 PM

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Comments: I am writing to provide support in listing the Sacramento Mountain salamander (SMS) as a Species of Conservation Concern (SCC) in the draft Lincoln National Forest plan. As currently written, the draft forest plan is negligent in overlooking the SMS as an at-risk species and not including it as needing special conservation status. In fact the salamander gets very little attention based on the few pages even acknowledging it. Whereas the SMS has not gotten much attention in general in recent years due to perceived greater threats of the state's only other endemic salamander, the Jemez Mountain salamander (JMS; federally listed as endangered in 2013), the SMS has quietly gone unnoticed yet is now facing similar threats. The threats are due to climate-induced drought and fire, as well as a novel fungal disease. At a time when large-scale fires are growing in the Southwest and are likely to continue, further shrinking available salamander habitat, the US Forest Service must acknowledge that the SMS faces imminent threats to its long-term persistence and immediately identify specific actions in the draft Forest Plan to prevent the chances of it reaching the same fate as the JMS.

The following are key risk factors to the SMS:

1) Declining number of historical sites where SMS are found: Based on recent surveys conducted by researchers from the University of Rhode Island, the number of historical sites where SMS have been found has declined. This appears to be more noteworthy in the Capitan Mountains, the northernmost mountain range where the salamander is found. The salamander is restricted to 3 mountain ranges which results in a highly fragmented population with low genetic diversity.

Further loss of habitat in any of the populations could lead to reduced genetic divergence.

When I conducted field research on SMS over a span of 20 yrs (1986-2005) we could almost consistently find salamanders at most all historical localities. This is clearly not the case today.

2) Large scale fires threaten salamanders by directly minimizing habitat. Impacts by 2 recent ones, the Little Bear and Three Rivers fires have adversely affected the salamander. Future fires are likely to continue and will threaten salamander populations at the highest elevations of their range.

3) Bsal, a new fungal disease: Studies by Matt Gray, University of Tennessee, show that SMS is highly vulnerable to this emerging disease which has caused severe population declines in European salamanders.