

10/31/08

Public Comments Processor
Att: FWS R8-2008-008
Division of Policy and Directive Management
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive-Suite 222
Arlington, Va. 22203

I'm upset with U.S. Fish and Wildlife Services' plans to dedicate 1.8 million acres of California as critical habitat for California's Red-legged frog. The same protective philosophy was applied to the Mountain Yellow-legged frog in the Sierra Mountains in California and it has led to eliminating trout in some of the productive Sierra trout lakes because of the unsubstantiated theory that fish have caused the elimination of frogs. I have been employed for over 40 years as a California Department of Fish and Game (CDFG) Fisheries Biologist on both sides of the Sierra for over 75% of my career. In all of my professional and recreational samplings from the mountain lakes, I have never seen any frogs or tadpoles in any trout stomachs I have examined. During recent years CDFG has conducted countless five year studies to determine the effects of trout being planted or not planted in known yellow-legged frog areas. The results concluded that trout populations had no effect on the frogs. It has been documented in numerous scientific journals that the worldwide depletion of the amphibians have been mainly caused by the detrimental effects of the increasing ultra violet light effects on the world frog's various life stages due to the increasing deterioration of the atmospheres ozone layers.

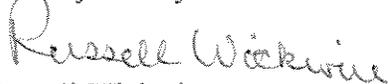
In past years, before the increased UV penetration, scientific studies have indicated that diseases, pesticides and urban sprawl developments have caused depleted amphibian populations.

Now this year the U.S. Forest Service is attempting to "reinvent the wheel" in conducting similar frog studies as CDFG studied. This results in reducing lakes and stream fishing in the Desolation Wilderness area near the SW corner of Lake Tahoe extending over the Sierra into the western slope of the Sierras of El Dorado County.

These Federal restrictions on the angler's use in Public Lands is not following President George W. Bush's, September 26, 2008 amendment to the 1995 Executive Order (number 12962) that ensures that "Federal agencies must maintain recreational fisheries on Federal Lands and waters". Recreational fishing has been described as an essential component of the Nation's heritage- a significant and a critical aspect of this countries successful conservation model which is the envy of the world.

Please send your response to the items addressed in this letter to:
Russell Wickwire, 20505 State Hwy 89, Markleeville, California 96120.

Thank you for your future consideration.


Russell Wickwire
Retired CDFG Associate Fisheries Biologist