

Friends of Bitter Lake National Wildlife Refuge
4065 Bitter Lakes Road, Roswell, NM 88201
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Public Comments Processing
ATTN: FWS-R2-ES-2009-0014
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
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Comments on the designation of critical habitat for Roswell springsnail (*Pyrgulopsis roswellensis*), Koster's springsnail (*Juturnia kosteri*), Noel's amphipod (*Gammarus desperatus*), and Pecos assiminea (*Assimineia pecos*) with respect to lands at the Bitter Lake National Wildlife Refuge.

We, the Friends of Bitter Lake National Wildlife Refuge, strongly recommend limiting designation of critical habitat to only suitable habitat (springs and spring flows) where the snails and amphipod can occur. No additional protection will be gained by designating other areas on the refuge as critical habitat. Not only do the snails and amphipod not occur in the areas away from the springs and spring flows due to lack of suitable habitat but a consequence of designating these areas will be to unnecessarily restrict or prevent the refuge staff from managing and improving habitats for the numerous other resident and migratory species found on the refuge. Restricting the designation of critical habitat to only suitable habitats will provide permanent "on-refuge" protection of these small aquatic habitats without causing unintended consequences that negatively affect the overall mission of the refuge.

The major threats to these species are wildfire and ground water depletion and contamination. Except for lightning-caused fires, these threats originate on private or Bureau of Land Management lands outside the refuge boundaries. Designation of critical habitat within the refuge boundary will not provide additional protection. Ground water depletion from wells and ground water contamination from off-refuge gas and oil drilling, septic tank drainage fields associated with houses near the refuge, and seepage of potentially harmful materials dumped into sinkholes on private land will not be prevented by designating critical habitat on the refuge. Likewise, the Sandhill Fire, a wind-driven wildfire that affected the amphipod population at Dragonfly Spring, began on private land.

Refuge habitat management and fire management plans already take into account the presence of these species and their distributions on the refuge. These plans include prescribed burns to reduce fuel loads that can lead to catastrophic wildfires (such as the Sandhill Fire). The populations are monitored and their habitats are currently protected and also improved where possible. For example, a dike was recently constructed to protect the spring vents and spring runs adjacent to

impoundments that are managed for waterfowl, shorebirds and other wildlife. Construction of the dike also created additional suitable habitat.

In summary, designating any part of Bitter Lake National Wildlife Refuge other than suitable habitats will not provide any additional protection but will result in unintended consequences that restrict, prevent or interfere with the other activities necessary to fulfill the mission of the refuge.



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Treasurer and Board Member

For

Bill Siders
President
Friends of Bitter Lake National Wildlife Refuge, Inc.